

**Barnet's Local Plan – Schedule of Representations on Publication Regulation 19 Town & Country Planning (Local Planning) (England) Regulations (Reg 19)**

Reference	Representor Reference	Representor	Section	Summary of Comments
REP001	ID095	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.
REP002	ID058	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.
REP003	ID010	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. <del>Maintaining the quality of the environment whilst delivering the levels of forecast growth is a key challenge for Barnet.</del> 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 .... <del>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.</del> 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.
REP004	ID009	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

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				<p>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 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"> <li>- Removing Car Dependency via the Planning Process [as hinted in the Good Grown concept [2.2.1]</li> <li>- 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.</li> <li>- 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.</li> <li>- 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.</li> </ul> <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. 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. 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>
REP005	ID083	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>

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REP006	ID095	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.</p> <p>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>
REP007	ID023	Brent Cross South Limited Partnership ( 'BXS LP'),	Para 2.4.1	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>
REP008	ID047	Finchley Society	Para 2.4.2	<p>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.</p> <p>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.</p>
REP009	ID083	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>
REP010	ID009	Barnet Cycling Campaign	Vision	<p>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.</p> <p>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.</p>
REP011	ID087	Sanjay Maraj	Chapter 3	<ol style="list-style-type: none"> <li>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.</li> <li>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"> <li>a. To deliver growth to housing aspirations and needs</li> <li>b. To improve the quality and type of housing</li> <li>c. To ensure new developments are high quality and sustainable</li> </ol> </li> </ol>

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				<p>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.</p> <p>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.</p> <p>2- Include CDH01 and CDH08 as referenced policies to three objectives:</p> <p>a. To deliver growth to housing aspirations and needs</p> <p>b. To improve the quality and type of housing</p> <p>c. To ensure new developments are high quality and sustainable</p> <p>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</p>
REP012	ID132	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, <b>we would still suggest adding specific references to good design</b> , which is important to ensuring the Barnet continues to be <i>"a place where people choose to make their home"</i> . References to 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..
REP013	ID008	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.
REP014	ID045	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</i>

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				<i>Borough's rivers to the benefit of people and wildlife whilst protecting our communities from flooding. <u>At the same time we will build our resilience to climate change and improve water quality.</u></i>
REP015	ID010	Barnet Green Spaces Network	Vision	<p>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 <del>Getting the best out of our natural environment through</del> 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.</p> <p>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 <a href="https://www.nationalparkcity.london/">https://www.nationalparkcity.london/</a> aims for healthier, greener, wilder city for people to live in</p> <p>Targets for schools and business groups to be represented</p> <p>Should also be included in <b>section 9 / Economy</b> – space for green jobs – putting sustainability front and centre including rewilding should bring new green jobs as well as provide a better working environment</p>
REP016	ID060	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.
REP017	ID047	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'
REP018	ID082	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 ( <a href="https://www.theguardian.com/uk-news/2021/jan/07/london-population-decline-first-time-since-1988-report-covid-home-working">https://www.theguardian.com/uk-news/2021/jan/07/london-population-decline-first-time-since-1988-report-covid-home-working</a> ) 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.
REP019	ID082	Lodge Lane N12	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

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		Resident's Association		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.
REP020	ID069	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 produced 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.
REP021	ID069	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 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</i>

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				<i>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. 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: 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 (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: 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. 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: 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>
REP022	ID009	Barnet Cycling Campaign	BSS01	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.
REP023	ID003	All Souls College	BSS01	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
REP024	ID081	Landsec	BSS01	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


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				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.															
REP025	ID094	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> <table border="1"> <thead> <tr> <th>New Homes for Barnet</th> <th>MHCLG Standard Methodology 9Dec 2020)</th> <th>London Plan (March 2021)</th> <th>Draft London Plan (Dec 2017)</th> <th>Barnet SHMA (Oct 2018)</th> </tr> </thead> <tbody> <tr> <td>Per annum</td> <td>5,361</td> <td>2,364</td> <td>3,134</td> <td>3,060</td> </tr> <tr> <td>Total 2021 - 2036</td> <td>80,415</td> <td>35,460</td> <td>47,000</td> <td>46,000</td> </tr> </tbody> </table> <p>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	3,060	Total 2021 - 2036	80,415	35,460	47,000	46,000
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															
REP026	ID058	Hammerson UK Prop and Aberdeen Standard Investments	BSS01	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															



Reference	Representor Reference	Representor	Section	Summary of Comments
				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
REP027	ID041	DTZ Investors UK Ltd	BSS01	<p>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 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, <del>and</del> District Town Centres, <u>and previously developed sites</u>. 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>
REP028	ID038	Diocese of London	BSS01	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

Reference	Representor Reference	Representor	Section	Summary of Comments
				<p>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>
REP029	ID132	TFL (Commercial Development)	<b>BSS01</b>	<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. <b>The targets set out in Tables 4.1 and 4.2 of the London Plan should be treated as minima</b> (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 <b>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.</b> Such an approach would conform with London</p>

Reference	Representor Reference	Representor	Section	Summary of Comments
				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.
REP030	ID013	Barnet Society Committee	BSS01	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
REP031	ID052	Friends of Market Place Playground	BSS01 GSS01 Para 4.6.1 Para 4.28.3	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.

Reference	Representor Reference	Representor	Section	Summary of Comments
				 <p data-bbox="770 549 2101 738">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>
REP032	ID070	Hurricane Trading Estate	BSS01	<p data-bbox="770 746 2101 879">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>
REP033	ID027	CasaBella Developments	BSS01	<p data-bbox="770 887 2101 1401">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</p>

Reference	Representor Reference	Representor	Section	Summary of Comments
				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.
REP034	ID060	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
REP035	ID066	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.
REP036	ID139	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.
REP037	ID083	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'.
REP038	ID041	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

Reference	Representor Reference	Representor	Section	Summary of Comments
				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.
REP039	ID023	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).
REP040	ID132	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, <b>we would suggest that consideration is given to drawing indicative 800m zones around stations and town centre boundaries.</b>
REP041	ID133	TFL (Spatial Planning)	Key Diagram	We welcome the amendment to the Crossrail 2 route which is now shown correctly terminating at New Southgate.
REP042	ID115	Roger Chapman Ramblers Herts & North Middlesex	Key diagram & Policies map	<i>add Strategic Walking network map – see separate attachment for map.</i> <i>Amend all <b>site specific proposals</b> 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.
REP043	ID009	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.
REP044	ID007	Barnet CCG	GSS01	We note that Table 5 has been amended to identify housing supply in each of the six Growth Areas. This is welcomed, and the CCG will continue to work with the Council to review healthcare infrastructure requirements in the Growth Areas, particularly Edgware Town Centre and Cricklewood. The CCG has contributed to the draft Infrastructure Delivery Plan (June 2021) which will need to be kept under review to ensure that it aligns with the NHS North Central London Estates Strategy and estate priorities in Barnet and the health and care locality planning work already underway.
REP045	ID083	LB Brent	GSS01	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. Proposed modification a) <del>Growth Areas</del> <i>Growth and Spatial Strategic Areas (23,300 homes):</i>

Reference	Representor Reference	Representor	Section	Summary of Comments
				<p><i>Brent Cross / Cricklewood Opportunity Area (referred in the Plan as Brent Cross Growth Area) – 9,500 homes (Policy GSS02)</i></p> <p><i>Brent Cross West Growth Area – 1,800 homes (Policy GSS03)</i></p> <p><i>Brent Cross North – 800 homes</i></p> <p><i>Brent Cross Town – 6,700 homes</i></p> <p><i>Cricklewood Town Centre Growth Area 1,400 homes (Policy GSS04)</i></p> <p><i>Edgware Town Centre Growth Area – 5,000 homes (Policy GSS05)</i></p> <p><i>Colindale Opportunity Area (referred to as Colindale Growth Area in the Plan) – 4,100 homes (Policy GSS06)</i></p> <p><i>Mill Hill East – 1,500 homes (Policy GSS07)</i></p> <p><i>b) District Town Centres – 5,400 homes (Policy GSS08)</i></p> <p><i>Barnet's District Town Centres (Policy GSS08)</i></p>
REPO46	ID069	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 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.</p>
REPO47	ID069	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</p>

Reference	Representor Reference	Representor	Section	Summary of Comments
				<p>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 then 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>



Reference	Representor Reference	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
				<b>Total</b>		<b>519</b>
				<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 new 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>		
REP048	ID083	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 <i>Policy Good Growth Objective GG2 Making the best use of land</i> <i>Policy Good Growth Objective GG4 Delivering the homes Londoners need</i></p>		
REP049	ID023	Brent Cross South Limited	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,</i></p>		

Reference	Representor Reference	Representor	Section	Summary of Comments
		Partnership ( 'BXS LP'),		<del>comprehensive development reflects an area that is</del> <del>refers to planned to ensure</del> the development of strategic sites which is undertaken in a coordinated way, with the goal of improving and regenerating the area <u>as a whole</u> . It is usually applied to large <u>and/or</u> 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 <u>and/or</u> Developers.
REP050	ID058	Hammerson UK Prop and Aberdeen Standard Investments	Para 4.10.3	Para 4.10.3 explains that the Brent Cross Growth Area is itself split into a further three sub areas: <ul style="list-style-type: none"> <li>▪ Brent Cross North;</li> <li>▪ Brent Cross Town;</li> <li>and ▪ Brent Cross West (Thameslink).</li> </ul> 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.
REP051	ID023	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 <u>principal</u> parts: Brent Cross North, Brent Cross Town, and Brent Cross West (Thameslink). These three areas are in <u>multiple</u> 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).
REP052	ID023	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 <del>South</del> Brent Cross Town within the Brent Cross Growth Areas are as shown in Map 3. Brent Cross West is illustrated by Map 3A.</i>
REP053	ID023	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 <u>over</u> 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 <u>mixed use neighbourhood residential quarter</u> will be supported by new and improved schools, community, health and leisure facilities, as well as improved parks and open spaces.</i>
REP054	ID023	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 <del>to create a new commercial quarter</del> 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>
REP055	ID023	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.'
REP056	ID023	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.'
REP057	ID023	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 <u>was</u> originally approved in 2010, <del>is now nearly a decade old</del> 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. The existing outline planning permission <u>was</u> originally</i>

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				<i>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 is 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>
REP058	ID023	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 <del>the wider</del> Brent Cross Growth Areas, and opportunities for connectivity between the two should be maximised.</i>
REP059	ID019	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 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”.
REP060	ID133	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.
REP061	ID133	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 <del>the alignment of the proposed New Southgate branch, which is a part of the Crossrail 2 route that is not currently safeguarded.</del>
REP062	ID133	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.
REP063	ID083	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.
REP064	ID023	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>
REP065	ID095	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

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				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.
REP066	ID132	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.
REP067	ID023	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 the office space consented in the Brent Cross Growth Area, another 67,000 m2 of new office space.</i>
REP068	ID023	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.
REP069	ID023	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.
REP070	ID023	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, 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.</i>
REP071	ID023	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 Growth Area covers 151 hectares, with proposals including a new commercial quarter 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.</i>
REP072	ID023	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 (along with parts of the Brent Cross West Growth Area) to create a new mixed use town centre with an additional 56,600m2 of comparison retail floorspace; approximately 7,500 new homes including affordable homes; a new and commercial quarter 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.
REP073	ID094	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

Reference	Representor Reference	Representor	Section	Summary of Comments
				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.
REP074	ID133	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.
REP075	ID069	Home Builders Federation	GSS01	Aspects of the policy are unsound because they are contrary to the London Plan. <b>Town Centres</b> 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. <b>Major Public Transport Infrastructure</b> 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: 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.
REP076	ID024	Bridge Industrial and Extra MSA London Gateway Ltd	GSS01	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

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				<p>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>
REP077	ID131	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 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. 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 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</p>

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				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 pro-active 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.
REP078	ID103	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.
REP079	ID009	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
REP080	ID021	Brad Blitz	GSS01 CDH01 CDH08 ECC06	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. 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 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. 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.
REP081	ID021	Brad Blitz	GSS01	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 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.

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REP082	ID067	Hill Residential Ltd & Trustees of Gwyneth Will Trust & Gwyneth Cowing 1968 Settlement	GSS01	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): <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> 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.
REP083	ID136	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.
REP084	ID081	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: "e) Major thoroughfares – <u>minimum of 3,350 homes (Policy GSS11)</u> ". 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.
REP085	ID050	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 be a minimum of 71,000. We recognise there is an element if '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.
REP086	ID050	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

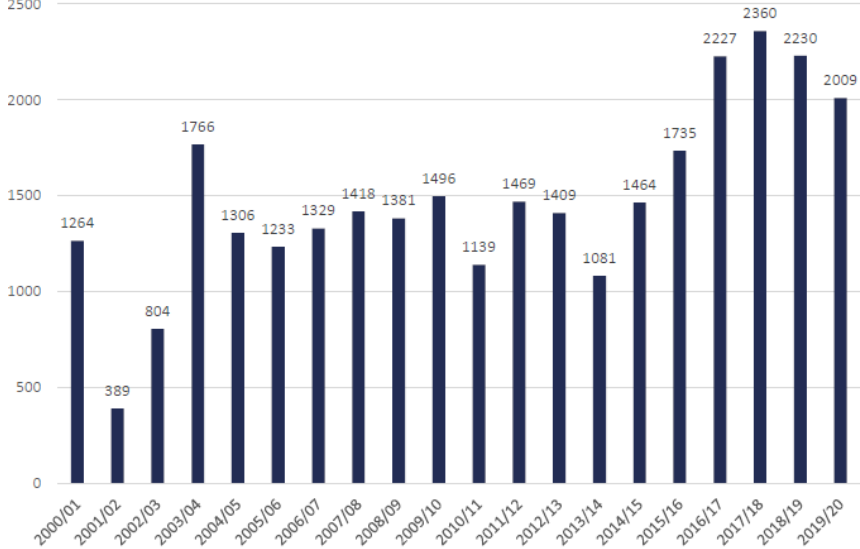


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				Barnet's Plan as a minimum, 46,000 remains as the objective. We find the retention of the 46,000 target odd. The London Plan EIP in effect found this target unsustainable yet Barnet has retained it. We certainly have doubts whether 46,000 is anywhere 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
REP087	ID041	DTZ Investors UK Ltd	GSS01	<p>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.</p> <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. 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 Previously developed sites, which fall within or outside of the locations identified above, should be prioritised for development opportunities for homes and other uses. 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>
REP088	ID038	Diocese of London	GSS01	The Council's current approach to delivering this growth focuses on regenerating and developing areas of brownfield and underused land. The Council are therefore proposing all allocations to be outside the Green Belt or within the built-up settlement area, for example seeking to deliver 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

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				<p>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.</p> <p><b>Smaller Sites</b> 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>
REP089	ID016	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</p>

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				<p>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: • 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.</p> <p>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.</p>
REP090	ID063	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>
REP091	ID023	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>
REP092	ID130	Berkeley Group (on behalf on St James Group Limited/St William Homes LLP)	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 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</p>

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				<p>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.</p> <p>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>
REP093	ID086	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</p>

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				<p>minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply.</p> <p>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 &amp; 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 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.</p> <p>Mactaggart &amp; 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><b>Figure 1 – Historical Housing Delivery in the London Borough of Barnet</b></p>  <table border="1" data-bbox="763 730 1619 1281"> <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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REP094	ID132	TFL (Commercial Development)	<b>GSS01</b>	<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</p>																																										

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				<p>(subject to our comments below on developing at TfL stations and environs including car parks). However, as above, we consider that <b>the housing targets should be expressed as minima</b>, 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> <table border="1" data-bbox="797 683 1610 1007"> <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 colspan="2"><b>TOTAL</b></td> <td><b>4,391</b></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 “<i>London Underground stations and environs, including car parks</i>”. 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. <b>It should remain as at least 1,000 homes as previously specified in the Reg 18 draft.</b> 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	<b>TOTAL</b>		<b>4,391</b>
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REP095	ID013	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.
REP096	ID119	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.
REP097	ID133	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.
REP098	ID070	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 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.
REP099	ID029	Clarion Housing Group and the Huntingdon Foundation	GSS01	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

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				<p>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>
REP100	ID100	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 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.</p>



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REP101	ID060	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.
REP102	ID045	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 SFRA as supporting the plan, there appears to be an assumption that the SFRA is the Sequential Test. They are not. The SFRA provides 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 is 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 were 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

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				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. <b>However, please note our representations to sites 6 and 9.</b> 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 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. 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.
REP103	ID135	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"> <li>• <i>Brent Cross Cricklewood Opportunity Area – at least 9,500 homes (Policy GSS02)</i></li> <li>• <i>Brent Cross West– at least 1,800 homes (Policy GSS03)</i></li> <li>• <i>Cricklewood Town Centre – at least 1,400 homes (Policy GSS04)</i></li> <li>• <i>Edgware Town Centre – at least 5,000 homes (Policy GSS05)</i></li> <li>• <i>Colindale Opportunity Area – at least 4,100 homes (Policy GSS06)</i></li> <li>• <i>Mill Hill – at least 1,500 homes (Policy GSS07)”</i></li> </ul> <p>Policy GSS05– suggested change</p> <ul style="list-style-type: none"> <li>• <i>To deliver growth and regeneration at Edgware Town Centre, the Council will seek the following from development proposals:</i></li> </ul> <p><i>At least 5,000 new homes;</i></p>
REP104	ID021	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). Specifically, we note that:</p>

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				<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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'.</p> <p>vi) On 1 March 2020, the Secretary of State set out a Battle Plan, including advising the public to remain and work from home.<sup>8</sup></p> <p>vii) On 3 March 2020, the UK Prime Minister Boris Johnson introduced an 'action plan', including advising more people to work from home.<sup>9</sup></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>
REP105	ID021	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>
REP106	ID021	Brad Blitz	GSS01 GSS08 CDH08	<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</p>

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			CDH01	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.
REP107	ID094	Mill Hill Missionaries	GSS01 Part A	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.
REP108	ID094	Mill Hill Missionaries	GSS01 Part B	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 of 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 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.
REP109	ID094	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

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				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.
REP110	ID094	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.
REP111	ID058	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
REP112	ID115	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 <b>GSS01 Delivering sustainable growth</b> 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>
REP113	ID139	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.
REP114	ID009	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.
REP115	ID058	Hammerson UK Prop and	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

Reference	Representor Reference	Representor	Section	Summary of Comments
		Aberdeen Standard Investments		<p>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-</p> <p>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 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. <del>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.</del></p>
REP116	ID058	Hammerson UK Prop and Aberdeen Standard Investments	GSS02	<p>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.</p> <p>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: <ul style="list-style-type: none"> <li>▪ necessary to make the development acceptable in planning terms;</li> <li>▪ directly related to the development; and</li> <li>▪ fairly and reasonably related in scale and kind to the development.</li> </ul> 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.</p>
REP117	ID058	Hammerson UK Prop and Aberdeen Standard Investments	GSS02	<p>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.</p>
REP118	ID023	Brent Cross South Limited	GSS02	<p>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</p>

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		Partnership ( 'BXS LP'),		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 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. 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.
REP119	ID023	Brent Cross South Limited Partnership ( 'BXS LP'),	GSS02	<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. Opportunities for optimising land and increasing site capacity across the Brent Cross Growth Area will be supported.</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"> <li>• Demonstrate how they assist in achieving and not undermining comprehensive development of the area;</li> <li>• Contribute towards the creation of a Metropolitan Town Centre;</li> <li>• 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></li> <li>• Protect and where possible improve the amenities of existing and new residents;</li> <li>• Create a high quality, safe and attractive environment accessible to all;</li> <li>• 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;</li> <li>• Provide sufficient community infrastructure, including new and expanded schools and primary healthcare capacity;</li> <li>• 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.</li> </ul> <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><u><i>The Brent Cross Growth Area is an area considered suitable for the development of tall buildings, in accordance with Policy CDH04.</i></u></p> <p><i>A New commercial quarter uses focussed around the new Brent Cross West rail station will provide 395,000m2 of office development for over 20,000 new jobs. <del>This Brent Cross Town</del> 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><u><i>Development proposals will need to bring forward the following. The following transport improvements will be brought forward within the Brent Cross Growth Area through detailed design, planning conditions and/ or Section 106 agreements:</i></u></p>

Reference	Representor Reference	Representor	Section	Summary of Comments
				<ul style="list-style-type: none"> <li>• <del>Prioritise</del> Pedestrian and cycle routes throughout the new development and improvements to pedestrian and cycle connections and routes beyond the development area;</li> <li>• <del>Ensure</del> Good access for disabled persons throughout the area with step-free access at Brent Cross Underground and Brent Cross West stations;</li> <li>• A new rail station (Brent Cross West) on Thameslink line supported by a public transport interchange;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• Improved pedestrian access across the A41 Hendon Way to link with Brent Cross Underground Station; and,</li> <li>• A new rail freight facility to replace the existing Strategic Rail Freight Site.</li> </ul> <p>Progress of Brent Cross - The Local Plan will establish a series of indicators to monitor progress on Brent Cross <u>Growth Area</u>...</p>
REP120	ID055	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.
REP121	ID133	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.
REP122	ID009	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.
REP123	ID019	Bestway Ltd	GSS03	<p>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:</p> <ul style="list-style-type: none"> <li>• "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".</li> </ul> <p>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".</p>
REP124	ID133	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



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				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.
REP125	ID007	Barnet CCG	GSS04	We also note that the Council will prepare a more detailed planning framework for Cricklewood Growth Area (Policy GSS04) and we would welcome the opportunity to review healthcare infrastructure requirements in this area.
REP126	ID105	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
REP127	ID009	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.
REP128	ID045	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"> <li>• The risk of fluvial flooding from Deans Brook, Edgwarebury Brook and Edgware Brook main rivers;</li> <li>• Functional floodplain (flood zone 3b) along the Deans Brook and Edgwarebury Brook river corridors;</li> <li>• There is also surface water flooding and a Critical Drainage Area (the Edgware Station CDA) within the growth area;</li> <li>• 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.</li> <li>• There are river restoration and enhancement opportunities identified for the Edgware Brook, Deans Brook and Silk Stream main rivers.</li> </ul> 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 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>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</p>

Reference	Representor Reference	Representor	Section	Summary of Comments
				<p>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"> <li>• 5,000 new homes;</li> <li>• Improved leisure options such as a new cinema, swimming pool and new eating-out options;</li> <li>• Appropriate floorspace for community, retail and office uses;</li> <li>• Improved public realm, including new public spaces;</li> <li>• Transformation of the relationship between the rail and bus stations and the wider town centre to improve the pedestrian experience and reduce congestion;</li> <li>• Retain existing levels of employment and pursue opportunities for new jobs.</li> <li>• Improved flood risk resilience for the town and surrounding communities with provision of flood risk infrastructure and restored rivers.</li> </ul> <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>
REP129	ID020	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>
REP130	ID135	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 "<del>75%</del> <i>Residential floorspace with 25% an appropriate mixed of town centre commercial uses (retail and office), entertainment, community, and car parking</i>"</p> <p>Site 28 "<del>70%</del> <i>Residential floorspace with 30% an appropriate mixed of town centre commercial uses (retail and office) and transport infrastructure</i>"</p>
REP131	ID001	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</p>

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				additional opportunities to deliver much needed homes within a sustainable location (see also comments on the Schedule of Sites in relation to housing need). 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.
REP132	ID132	TFL (Commercial Development)	GSS05	TfL CD welcomes Edgware Town Centre being identified as an opportunity for regeneration and intensification and supports this policy, <b>subject to the housing target being expressed as a minimum ie: <i>At least 5,000 new homes</i></b> ; 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.
REP133	ID133	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.
REP134	ID002	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.
REP135	ID077	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.
REP136	ID077	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.

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REP137	ID009	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.
REP138	ID045	Environment Agency	GSS06	<p>Our regulation 18 comments highlighted some key environmental features and challenges that were specific to Colindale Growth area. This included:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Colindale receives a level of protection from flood storage areas constructed as part of the Silk Stream Flood Alleviation Scheme approximately 10 years ago.</li> <li>• 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.</li> <li>• 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:</li> </ul> <p>Several river restoration measures have been identified to enhance biodiversity of the Silk Stream main river such as removal of wooden toe-boarding, removal of concrete bed and banks, removal of weirs and fish easement at weirs in the Silk Stream, Montrose and Rushgrove Parks. These projects should occur alongside improvements to the open spaces themselves. 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 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 (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,</p>

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				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.
REP139	ID132	TFL (Commercial Development)	GSS06	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 “ <i>new station</i> ”, 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: <b><i>New Colindale Underground Station ticket hall building station with step-free access to the platforms and sufficient gate capacity ... etc</i></b> 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: <b><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></b>
REP140	ID133	TFL (Spatial Planning)	GSS06 Para 4.19.4	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 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.’
REP141	ID070	Hurricane Trading Estate	GSS06	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

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				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.
REP142	ID029	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 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'. 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 an 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 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</p>

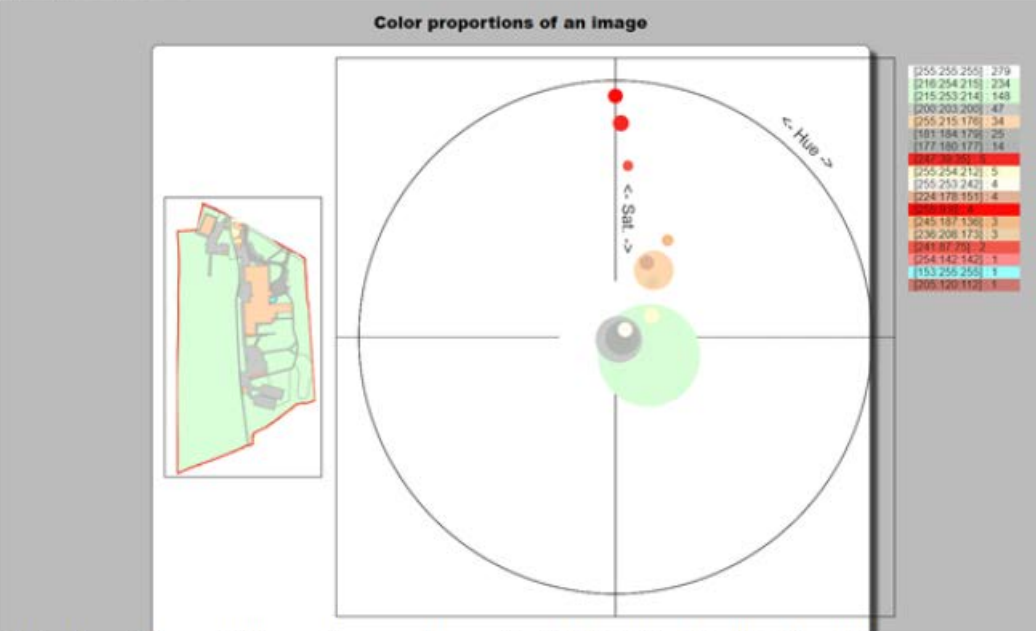
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				<p>locations that have development capacity to accommodate new housing and commercial development (Para 2.1.1). The Draft Policy GSS06 should acknowledge and support the role the Growth Area has in relation to delivering the 2,000 indicative jobs 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.</i></p> <p><i>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"> <li>• New job opportunities and better quality commercial floorspace.</li> </ul> <p><i>Colindale development up to 2036 will be focussed at the following locations:</i></p> <ul style="list-style-type: none"> <li>• Land at Colindale Underground Station will be redeveloped to provide a new, higher capacity, step-free access station that incorporates cycle parking;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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.</li> <li>• 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.</li> </ul> <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>
REP143	ID015	Joshua Barnett	GSS07	<p>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 &amp; acts as a local carbon offset; Effect on conservation area: as mentioned this land is green belt &amp; housing needs should be better directed 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</p>
REP144	ID103	Oakfield House, Burtonhole Lane, Mill Hill	GSS07	<p>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</p>

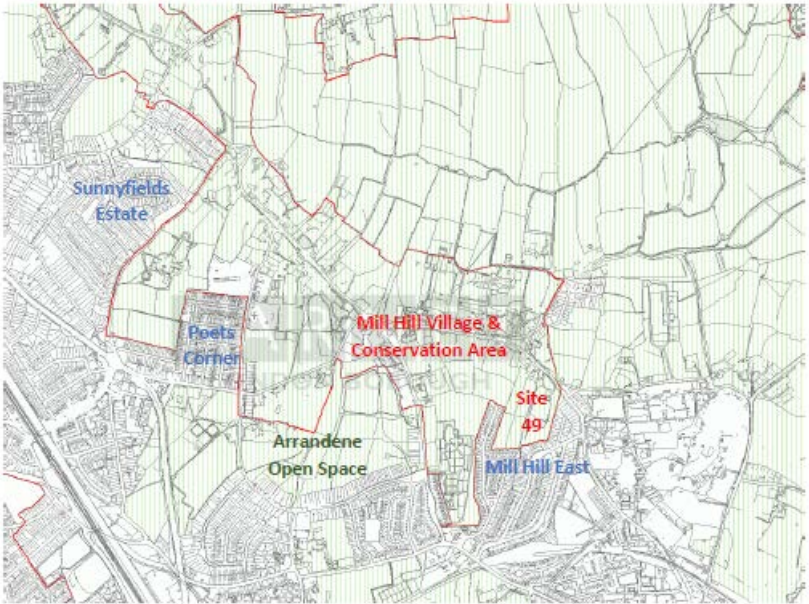
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				impact resulting from the cumulative development, or require the developments to be strategically masterplanned to avoid a cumulative impact.
REP145	ID096	Victor Montefiore	GSS07	<p>A. The percentages in the statement "80% retained as undeveloped 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 <b>footprint of the buildings</b> and should not impact the openness of the Green Belt" etc.</p>
REP146	ID136	John Lewis Partnerships	GSS07	<p>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 <b>bold</b>. <i>The Council will positively consider proposals on suitable sites to deliver further good suburban growth, including at <del>Mill Hill East Station</del>, Watchtower House and IBSA House. <b>More intensive development may be appropriate at Mill Hill East Station and on land to the South of Mill Hill East Station</b>, 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.</i></p>
REP147	ID132	TFL (Commercial Development)	GSS07	<p>TfL CD appreciates the Council's support to deliver good growth at Mill Hill East Station. <b>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.</b> 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, <b>all housing targets should be expressed as minima</b> 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.</p>
REP148	ID133	TFL (Spatial Planning)	GSS07	<p>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</p>



Reference	Representor Reference	Representor	Section	Summary of Comments
				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.
REP149	ID125	Elizabeth Silver and 18 Co-Signatories	GSS07	<p><b>A. Watchtower House and Kingdom Hall - A1. Non-compliance with Duty to Cooperate</b> The Mayor has stated (Appendix B Reg 18 Schedule of Representations &amp; 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><b>A2. Not justified</b> 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><b>A3. Contravention of London Plan Policy G2 and NPPF 2021 paras 137, 140, 141, 147-149:</b> A significant increase in footprint or volume on Green Belt, if permitted, can effectively <b>de-designate</b> the Green Belt and <b>destroy its permanence</b>. Reg 19 permits the increase of the built footprint on Site 49 from the current 7% to 20%, i.e. a <b>three-fold increase</b>. 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><b>A4. Contravention of Policy G1:</b> 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>B Mill Hill East station</b></p> <p><b>B1. Non-compliance with Duty to Cooperate with Mayor and TfL</b> 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><b>B2. Contravention of London Plan Policies T3 and T5:</b> 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><b>B3. Unsoundness – due to ambiguity, contrary to NPPF 2021 para 16d</b> Barnet Council (Appendix B Reg 18 Schedule of Representations &amp; 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. " 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><b>To make GSS07 legally compliant and sound</b></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>
REP150	ID096	Victor Montefiore	GSS07 Para 3	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.

Reference	Representor Reference	Representor	Section	Summary of Comments
				<p>B. The sales particulars for the site say that the western parcel is 38,565m<sup>2</sup> (i.e. 3.86 hectares) and the eastern parcel is 32,629m<sup>2</sup> (i.e. 32.6 hectares) totalling 71,194m<sup>2</sup> (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 m<sup>2</sup> (i.e. 3.81 hectares) and the eastern parcel is 28,058m<sup>2</sup> (i.e. 2.81 hectares) totalling 66,122m<sup>2</sup> (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: <a href="https://ibsaproperty.com/properties/watchtower-house/">https://ibsaproperty.com/properties/watchtower-house/</a> and <a href="https://web.archive.org/web/20210725180220/https://ibsaproperty.com/properties/watchtower-house/">https://web.archive.org/web/20210725180220/https://ibsaproperty.com/properties/watchtower-house/</a></p> <p>[2] Source: <a href="https://web.archive.org/web/20210725180417/https://ibsaproperty.com/properties/conf-centre-and-open-field/">https://web.archive.org/web/20210725180417/https://ibsaproperty.com/properties/conf-centre-and-open-field/</a> and <a href="https://ibsaproperty.com/properties/conf-centre-and-open-field/">https://ibsaproperty.com/properties/conf-centre-and-open-field/</a></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: <a href="https://www.london.gov.uk/sites/default/files/PAWS/media_id_491869/Mayor%20Response%20Barnet%20Reg%2018%20final.pdf">https://www.london.gov.uk/sites/default/files/PAWS/media_id_491869/Mayor%20Response%20Barnet%20Reg%2018%20final.pdf</a></p> <p>[5] Source: <a href="https://barnet.moderngov.co.uk/documents/s65265/Appendix%20B%20-%20Barnets%20Local%20Plan%20Schedule%20of%20Representations%20and%20Responses%20to%20Preferred%20Approach%20.pdf">https://barnet.moderngov.co.uk/documents/s65265/Appendix%20B%20-%20Barnets%20Local%20Plan%20Schedule%20of%20Representations%20and%20Responses%20to%20Preferred%20Approach%20.pdf</a></p>

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				 <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>
REP151	ID096	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> <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 '<b>Growth Area</b>' 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 '<b>Growth Area</b>' 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</p>

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				<p><i>the hill to the south served as a working farm, with dairy cows and chickens being resident.”</i> (see <a href="https://ibsaproperty.com/properties/conf-centre-and-open-field/details/">https://ibsaproperty.com/properties/conf-centre-and-open-field/details/</a> ) 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 <b>'Growth Area'</b> 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 <b>'Growth Area'</b> 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 <a href="https://www.barnet.gov.uk/planning-and-building/planning-policies/local-plan-review/call-sites">https://www.barnet.gov.uk/planning-and-building/planning-policies/local-plan-review/call-sites</a> ) 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 (<a href="https://www.cbre.co.uk/research-and-reports/UK-Will-Working-from-Home-Change-the-Central-London-Office-Market-March-2021">https://www.cbre.co.uk/research-and-reports/UK-Will-Working-from-Home-Change-the-Central-London-Office-Market-March-2021</a> <a href="https://www.jll.co.uk/en/trends-and-insights/cities/how-post-pandemic-living-will-redefine-uk-real-estate">https://www.jll.co.uk/en/trends-and-insights/cities/how-post-pandemic-living-will-redefine-uk-real-estate</a> <a href="https://www.architectsjournal.co.uk/news/city-of-london-looks-to-turn-empty-offices-into-homes">https://www.architectsjournal.co.uk/news/city-of-london-looks-to-turn-empty-offices-into-homes</a> ).</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><b>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)</b></p> 
REP152	ID096	Victor Montefiore	GSS07 Para 3 and 5 and Map 3E	<p>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)</p> <p>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.</p> <p>C. Removal of site 49 from Map 3E Mill Hill East Growth Area</p>

Reference	Representor Reference	Representor	Section	Summary of Comments
REP153	ID047	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.
REP154	ID009	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 <a href="http://www.bike-drop.com/">www.bike-drop.com/</a> ] which would be especially attractive to owners of E-bikes and large adaptive cycles and cargo bikes.
REP155	ID021	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).
REP156	ID021	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.
REP157	ID116	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 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

Reference	Representor Reference	Representor	Section	Summary of Comments
				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 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.
REP158	ID050	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.
REP159	ID132	TFL (Commercial Development)	<b>GSS08</b>	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 <b>all housing targets should be expressed as minima</b> 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, <b>we suggest, again, that clarification is provided as to what types of impacts are meant to be avoided.</b> 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). <b>We suggest that this is replaced by a specific reference to the London Plan as setting standards for car parking.</b> We appreciate the additional support for active travel modes and the Healthy Streets Approach which has been added since Reg 18. <b>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).</b>
REP160	ID013	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.
REP161	ID133	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.

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REP162	ID100	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 <sup>2</sup> 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.
REP163	ID009	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].
REP164	ID116	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.
REP165	ID050	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
REP166	ID041	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: <b><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></b>
REP167	ID063	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 be considered sound on this basis.

Reference	Representor Reference	Representor	Section	Summary of Comments
REP168	ID132	TfL (Commercial Development)	GSS09	<p>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. <b>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.</b> 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). <b>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.</b></p> <p>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.</p> <p>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. <b>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.</b> 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></p>
REP169	ID013	Barnet Society Committee	GSS09	<p>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.</p>
REP170	ID119	Ropemaker Properties Ltd	GSS09	<p>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</p>



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				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.
REP171	ID133	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.
REP172	ID095	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.
REP173	ID125	Elizabeth Silver and 18 Co-Signatories	<b>GSS09 Site 47_</b>	<b>Unsound: Not justified or deliverable for Mill Hill East Station</b> 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. <b>To Make GSS09 Sound:</b> Remove Mill Hill East (station) from GSS09 final para "Existing Transport Hubs".
REP174	ID009	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.
REP175	ID012	Barnet Liberal Democrats	GSS10	<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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</li> </ol>

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				<p>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>
REP176	ID016	Barratt London	GSS10	In line with the above, we would again welcome the housing target being expressed as a minimum.
REP177	ID054	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>
REP178	ID009	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.
REP179	ID083	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.
REP180	ID081	Landsec	GSS11	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

Reference	Representor Reference	Representor	Section	Summary of Comments
				<p>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> <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.</p> <p>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"> <li>• Brent Cross Growth (Opportunity) Area (Policy GSS02);</li> <li>• Brent Cross West Growth (Opportunity) Area (Policy GSS03);</li> <li>• Colindale Growth (Opportunity) Area including Grahame Park Estate (Policy GSS06);</li> <li>• Cricklewood Growth (Opportunity) Area (Policy GSS04);</li> <li>• Edgware Growth Area (Policy GSS05);</li> <li>• West Hendon Estate (Policy GSS10);</li> <li>• New Southgate Opportunity Area27 (Policy GSS09);</li> <li>• Major Thoroughfares - Edgware Road (A5) and Great North Road (A1000) (Policy GSS11); and the</li> <li>• Town Centres of Finchley Central and North Finchley (Policy GSS08)</li> </ul> <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:</p> <p><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, <u>as identified on the Policies Map, optimising site availability and good public transport accessibility 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>
REP181	ID116	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 <b>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.</b></p>

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REP182	ID001	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"> <li>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></li> <li>2) <i>Any such locations and appropriate tall building heights should be identified on maps in Development Plans.</i></li> <li>3) <i>Tall buildings should only be developed in locations that are identified as suitable in Development Plans.</i></li> </ol> <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> <p>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.</p>
REP183	ID132	TfL (Commercial Development)	<b>GSS11</b>	<p>TfL CD supports redevelopment of sites along main road corridors, particularly for housing delivery and <b>at a density / scale that is optimised according to public transport accessibility</b> (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. <b>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).</b> 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. <b>In addition, it should be made clear that “substantial public transport investment” 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.</b> Therefore we suggest that para 4.26.6 is amended as follows:</p> <p><i>Within Barnet there are routes that are managed by Transport for London (TLRN) <b>along parts of which could potentially be suitable for housing delivery (particularly reinstating former homes and infill development).</b> <del>enhanced,</del> <b>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:</b></i></p> <ul style="list-style-type: none"> <li>•• A406 North Circular;</li> <li>•• A1 Great North Way/ Watford Way; and</li> <li>•• A41 Edgware Way / Watford Way / Hendon Way.</li> </ul>

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REP184	ID133	TFL (Spatial Planning)	GSS11	We welcome amendments to the last bullet point which now refers to 'any proposals for car parking...' as requested.
REP185	ID100	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.
REP186	ID009	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.
REP187	ID021	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 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.
REP188	ID021	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

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				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.
REP189	ID081	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.
REP190	ID116	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.
REP191	ID050	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.
REP192	ID132	TFL (Commercial Development)	<b>GSS12</b>	TfL CD supports the re-development of publicly accessible surface level car parks for residential and other suitable uses
REP193	ID013	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

Reference	Representor Reference	Representor	Section	Summary of Comments
				Barnet (FORAB).Require transport assessments for edge-of-London locations to factor in developments outside the borough boundary.
REP194	ID133	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
REP195	ID139	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.
REP196	ID034	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.
REP197	ID009	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, Copthall 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.
REP198	ID014	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.
REP199	ID012	Barnet Liberal Democrats	GSS13	<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> </ol>

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				<p>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.</p> <p>5. We believe these small open spaces are important to protect against urban heat islands and also flash floods.</p> <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>
REP200	ID125	Elizabeth Silver and 18 Co-Signatories	GSS13	<p><b>Contravention of NPPF 2021 para 16d (due to ambiguity), and paras 137 and 174a</b> There is <b>ambiguity</b> 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 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.”</p>
REP201	ID010	Barnet Green Spaces Network	GSS13, Para 4.28.4, & ECC04	<p>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.</p>
REP202	ID010	Barnet Green Spaces Network	GSS14 & ECC06	<p>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.</p> <p>Introduce a new strategic policy on Rewilding GSS14 <b>Rewilding</b> 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.</p> <p>Introduce addition to <b>Policy ECC06 Biodiversity</b> a1) supporting proposals for Wild belts, land specifically designated as places for nature recovery. Add appropriate supporting text in para <b>10.26.5</b> “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</p>



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				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.
REP203	ID083	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.
REP204	ID023	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.
REP205	ID083	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
REP206	ID023	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).
REP207	ID087	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.
REP208	ID078	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

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				<p>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.</p> <p>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.</p>
REP209	ID023	Brent Cross South Limited Partnership ('BXS LP'),	Para 5.17.2	<p>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:</p> <p><i>As part of the Council's plans for the Brent Cross Growth Area delivery of a Build to Rent <del>scheme</del> 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></p> <p>Clarity is also required in relation to the Discount 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:</p> <p><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, <del>delivered at a genuinely affordable rent level - with at least 30% provided at London Living Rent levels and the 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.</del></i></p>
REP210	ID023	Brent Cross South Limited Partnership ('BXS LP'),	Para 5.2.4	<p>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.</p>
REP211	ID023	Brent Cross South Limited Partnership ('BXS LP'),	Para 5.4.7	<p>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</i></p>

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				<i>assessment should be undertaken in line with the NPPF, the Planning Practice Guidance, and the Mayor's Affordable Housing and Viability SPG.</i>
REP212	ID069	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.
REP213	ID023	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>
REP214	ID007	Barnet CCG	HOU01	We welcome the changes the Policy HOU01 Affordable housing which support approaches to secure housing for critical key workers on land owned by Government departments and agencies. We note that the fifth para of the policy refers to critical key workers in the context of school attendance during the COVID-19 crisis. We suggest that this is replaced with a reference to Annex 2 of the National Planning Policy Framework which defines 'essential local workers'. This includes NHS staff. We note that para 5.4.9 refers to the London Plan requirement for at least 50% affordable housing on public sector land. We suggest that the para also states that public sector land represents an opportunity to deliver homes that can meet the needs of essential workers, such as those working in health, fire, police, transport and support services. This is reflected in a recent permission for residential accommodation for NHS staff/healthcare workers on land owned by the NHS adjacent to Finchley Memorial Hospital (20/4343/OUT) where a nomination approach was agreed to meet an identified housing need for homes for NHS staff.
REP215	ID081	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.
REP216	ID064	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.
REP217	ID056	Philip Greene	HOU01	I am concerned about the proposal to build 556 units of affordable housing in the immediate facility 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

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				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.
REP218	ID067	Hill Residential Ltd & Trustees of Gwyneth Will Trust & Gwyneth Cowing 1968 Settlement	HOU01	<p>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.</p> <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>
REP219	ID092	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 &amp; 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</p>

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				<p>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.</p> <p>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 &amp; 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 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>

Reference	Representor Reference	Representor	Section	Summary of Comments
REP220	ID012	Barnet Liberal Democrats	HOU01	<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>4. We do not believe it is consistent with the policy of North Central London Integrated Care Partnership to focus on reducing health inequalities.</li> <li>5. We do not believe it is consistent with London Plan targets of 50% affordable housing.</li> </ol> <p>Modifications: We believe current percentages of new developments should be retained – 50%.</p>
REP221	ID023	Brent Cross South Limited Partnership (‘BXS LP’),	HOU01	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.
REP222	ID130	Berkeley Group (on behalf of St James Group Limited/St William Homes LLP	HOU01	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’
REP223	ID047	Finchley Society	HOU01	‘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.
REP224	ID132	TFL (Commercial Development)	<b>HOU01</b>	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.
REP225	ID029	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

Reference	Representor Reference	Representor	Section	Summary of Comments
				<p>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>"</p>
REP226	ID064	Joe Henry	HOU02	<p>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-bedrom 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.</p>
REP227	ID082	Lodge Lane N12 Resident's Association	HOU02	<p>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.</p>
REP228	ID082	Lodge Lane N12 Resident's Association	HOU02	<p>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)</p>

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REP229	ID053	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" .
REP230	ID069	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 reworded 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'.
REP231	ID067	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.
REP232	ID092	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 reason 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) 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. <i>Innovative housing products that meet the requirements of this Policy will be supported. <u>The Borough recognises that providing a mix of housing types may not be feasible in specialist housing.</u></i>



Reference	Representor Reference	Representor	Section	Summary of Comments
REP233	ID094	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.
REP234	ID038	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.
REP235	ID016	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.
REP236	ID063	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').
REP237	ID023	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

Reference	Representor Reference	Representor	Section	Summary of Comments
				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.
REP238	ID023	Brent Cross South Limited Partnership ('BXS LP'),	HOU02	<p>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:</p> <p><i>Barnet dwelling size priorities are:</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, 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></p> <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) Any special characteristics applying to specific types of tenure (for example Build to Rent development).</i></p> <p><i>g) 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>
REP239	ID086	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>

Reference	Representor Reference	Representor	Section	Summary of Comments																													
				<p><b>Figure 2 – Required Market Housing in Barnet (extract from Local Plan)</b></p> <table border="1"> <thead> <tr> <th>Unit Size</th> <th>Market Housing</th> </tr> </thead> <tbody> <tr> <td>1-bedroom</td> <td>6%</td> </tr> <tr> <td>2-bedroom</td> <td>24%</td> </tr> <tr> <td>3-bedroom</td> <td>40%</td> </tr> <tr> <td>4-bedroom</td> <td>25%</td> </tr> <tr> <td>5-bedroom</td> <td>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> <p><b>Figure 3 – Housing Mix [2011 / 2012 – 2019 / 2020]</b></p> <table border="1"> <thead> <tr> <th rowspan="2">Unit Type</th> <th colspan="5">Number of Bedrooms</th> </tr> <tr> <th>1 / studio</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> </tr> </thead> <tbody> <tr> <td><b>Total Number of Units</b></td> <td>40%</td> <td>26%</td> <td>16%</td> <td>9%</td> <td>9%</td> </tr> </tbody> </table>	Unit Size	Market Housing	1-bedroom	6%	2-bedroom	24%	3-bedroom	40%	4-bedroom	25%	5-bedroom	5%	Unit Type	Number of Bedrooms					1 / studio	2	3	4	5	<b>Total Number of Units</b>	40%	26%	16%	9%	9%
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REP240	ID095	Mill Hill Preservation Society	HOU02	MHPS supports policy HOU02 and the priority attached to the provision of 3-bedroom units.
REP241	ID013	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.
REP242	ID070	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.
REP243	ID029	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 all households in the Borough. In protecting existing housing stock across Barnet the</i></p>

Reference	Representor Reference	Representor	Section	Summary of Comments
				<p><i>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"> <li><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></li> <li><i>2. Viability;</i></li> <li><i>3. The mix of uses;</i></li> <li><i>4. The range of tenures;</i></li> <li><i>5. The aim to optimise housing potential on sites;</i></li> <li><i>6. Potential for custom-build and community led schemes;</i></li> <li><i>7. The ability of new development to reduce pressure on conversion, sub-division and amalgamation of existing stock;</i></li> <li><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> </li></ol>
REP244	ID100	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</p>

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				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.
REP245	ID139	Theresa Villiers MP	HOU02	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.
REP246	ID064	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>
REP247	ID053	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>
REP248	ID009	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.
REP249	ID092	McCarthy and Stone Retirement Lifestyles and Churchill Retirement Living	HOU03	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

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				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>
REP250	ID095	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.
REP251	ID013	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.
REP252	ID133	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, 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.'
REP253	ID139	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.
REP254	ID064	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?
REP255	ID069	Home Builders Federation	HOU04	<b>1: Housing Choice for People with social care and health support needs</b> 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. 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:

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				<p><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"> <li>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></li> <li>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></li> <li>3) <i>the increasing need for accommodation suitable for people with dementia.</i></li> </ol> <p>The London Plan observes that the number of older people in the city-region will increase substantially. As para 4.13.2 observes:</p> <p><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. <b>Appropriate accommodation is needed to meet the needs of older Londoners.</b></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"> <li>• <i>personal care and accommodation are provided together as a package with no clear separation between the two</i></li> <li>• <i>the person using the service cannot choose to receive personal care from another provider</i></li> <li>• <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></li> <li>• <i>likely CQC-regulated activity<sup>72</sup> will be ‘accommodation for persons who require nursing or personal care’</i></li> </ul> <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> <ol style="list-style-type: none"> <li>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</i></li> <li>b. <i>residents have a choice as to who provides their personal care</i></li> <li>ii. <i>housing is occupied under a long lease or freehold, or a tenancy agreement, licensing agreement, license to occupy premises or a leasehold agreement</i></li> <li>iii. <i>housing provided is specifically designed and managed for older people (minimum age of 55 years)</i></li> <li>iv. <i>likely CQC-regulated activity<sup>73</sup> will be ‘personal care’</i></li> </ol> <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</p>



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				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>
REP256	ID009	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.
REP257	ID092	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 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</p>

Reference	Representor Reference	Representor	Section	Summary of Comments
				<p>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 <del>400m</del> walking distance of local shops and easily accessible by public transport with the exception of <u>specialist residential care facilities</u>;</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>
REP258	ID094	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>
REP259	ID064	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 it's 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>

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REP260	ID064	Joe Henry	HOU06	Are build to rent schemes exempt from providing a mix of dwellings?
REP261	ID094	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 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>
REP262	ID033	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.]... 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.]... 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. 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</p>

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				<p>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> <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> <ul style="list-style-type: none"> <li>- working collaboratively with neighbouring local planning authorities; and</li> <li>- establishing whether households fall within the planning definition for Gypsies, Travellers and Travelling Showpeople.</li> </ul> <p>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 GTTA 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</p>

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				<p>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> <ul style="list-style-type: none"> <li>• 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: <ul style="list-style-type: none"> <li>- she visited a site of five caravans, parked in the car park of Bethune Park in N11 on December 6th, 2019, and</li> <li>- 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</li> <li>- 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.</li> </ul> </li> </ul> <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</p>

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				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.
REP263	ID089	Marstead Living Limited/IBSA	HOU01	<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. 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> <ul style="list-style-type: none"> <li>(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);</li> <li>(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</li> <li>(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.</li> </ul> <p>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>

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REP264	ID089	Marstead Living Limited/IBSA	HOU02	<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>
REP265	ID050	FORAB	HOU02	<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 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>
REP266	ID050	FORAB	HOU03	<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 7m<sup>2</sup>, 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</p>

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				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.
REP267	ID089	Marstead Living Limited/IBSA	HOU04	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).
REP268	ID116	Regal JP North Finchley Ltd	HOU04	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.
REP269	ID089	Marstead Living Limited/IBSA	HOU05	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



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				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.
REP270	ID132	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.
REP271	ID008	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.
REP272	ID011	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 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.
REP273	ID110	Peter Piper	Section 6.13	6.13 <u>Climate Mitigation and Carbon Reduction</u> . 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. <a href="https://www.kentonline.co.uk/medway/news/councils-plans-to-tackle-climate-change-223124/">https://www.kentonline.co.uk/medway/news/councils-plans-to-tackle-climate-change-223124/</a> ) 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.".
REP274	ID026	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
REP275	ID047	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.
REP276	ID023	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 <del>places</del> 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</i>

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				<i>as Finchley Central and North Finchley and along historic routes such as the Edgware Road (A5) and the Great North Road (A1000).</i>
REP277	ID047	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."
REP278	ID047	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
REP279	ID025	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: <i>"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."</i>
REP280	ID025	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 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>
REP281	ID082	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.
REP282	ID082	Lodge Lane N12	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

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		Resident's Association		specific Design Codes for Small Sites" to emphasise that different small sites may have different design codes, in line with national policy.
REP283	ID110	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.
REP284	ID023	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, <u>having regard to Secured by Design guidance. Where appropriate, the Council will ensure through conditions on planning consents that Secured by Design is applied.</u></i>
REP285	ID021	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.
REP286	ID028	Roger Chapman	CDH01	<b>Amend CDH01 insert new para a)</b> 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.
REP287	ID067	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.
REP288	ID050	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 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

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				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
REP289	ID063	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.
REP290	ID023	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: v. <del>Adopt</del> 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>
REP291	ID013	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.
REP292	ID010	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. <b>Amend Policy CDH01</b> - 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.
REP293	ID133	TFL (Spatial Planning)	CDH01	We welcome the added reference to the Healthy Streets Approach.
REP294	ID070	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.
REP295	ID093	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.

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REP296	ID061	Harrison Varma Ltd	CDH01 Para 6.4.2	<p>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 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.</p> <p>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. <b><u>Para 6.4.2</u></b> (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</p> <p><b><u>Policy CDH01</u></b> (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>
REP297	ID139	Theresa Villiers MP	CDH01	<p>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</p>

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				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.
REP298	ID069	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.
REP299	ID009	Barnet Cycling Campaign	CDH02	We support the commitment to sustainable design and the BREEAM method.
REP300	ID067	Hill Residential Ltd & Trustees of Gwyneth Will Trust & Gwyneth Cowing 1968 Settlement	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.
REP301	ID094	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.
REP302	ID012	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.
REP303	ID026	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.
REP304	ID009	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 Scorecardsiv at 24thplace. We want Barnet to be the leading Outer London borough for Healthy Streets.
REP305	ID070	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

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				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.
REP306	ID082	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.
REP307	ID068	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.
REP308	ID042	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
REP309	ID045	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 complement the objectives of the Thames River Basin Management Plan in avoiding further deterioration and seeking to restore and enhance watercourses.
REP310	ID083	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> "

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REP311	ID136	John Lewis Partnerships	CDH04	<p>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 <b>bold</b>. <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"> <li>• <i>Brent Cross Growth (Opportunity) Area (Policy GSS02);</i></li> <li>• <i>Brent Cross West Growth (Opportunity) Area (Policy GSS03)</i></li> <li>• <i>Colindale Growth (Opportunity) Area including Grahame Park Estate (Policy GSS06);</i></li> <li>• <i>Cricklewood Growth (Opportunity) Area (Policy GSS04);</i></li> <li>• <i>Edgware Growth Area (Policy GSS05);</i></li> <li>• <b>Mill Hill East (Policy GSS07) (on sites close to the Station)</b></li> <li>• <i>West Hendon Estate (Policy GSS10);</i></li> <li>• <i>New Southgate Opportunity Area27 (Policy GSS09);</i></li> <li>• <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></li> </ul>
REP312	ID020	Betterpride Ltd	CDH04	<p>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.</p>
REP313	ID081	Landsec	CDH04	<p>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.</p>
REP314	ID116	Regal JP North Finchley Ltd	CDH04	<p>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 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</p>



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				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 satisfactory address the criteria set out in the policy, and therefore sufficient controls are in place to refuse unacceptable proposals.
REP315	ID032	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</p>

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				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.
REP316	ID135	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.
REP317	ID041	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.
REP318	ID016	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

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				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 ( <del>8 to 14 storeys (26 to 46 metres above ground level)</del> ) 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, <del>or they are such as</del> appropriately sited within an Opportunity Area or Growth Area. As 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.
REP319	ID063	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.
REP320	ID023	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.
REP321	ID130	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

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				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.
REP322	ID055	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.
REP323	ID001	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.
REP324	ID132	TfL (Commercial Development)	<b>CDH04</b>	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, <b>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 development (likely to include very tall buildings) can be achieved.</b> In addition, we believe that a <b>design-led approach</b> to 'very tall' buildings would be appropriate, in accordance with London Plan policy D9.
REP325	ID013	Barnet Society Committee	CDH04	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.

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REP326	ID119	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"> <li>• Brent Cross Growth (Opportunity) Area (Policy GSS02);</li> <li>• Brent Cross West Growth (Opportunity) Area (Policy GSS03);</li> <li>• Colindale Growth (Opportunity) Area including Grahame Park Estate (Policy GSS06);</li> <li>• Cricklewood Growth (Opportunity) Area (Policy GSS04);</li> <li>• Edgware Growth Area (Policy GSS05);</li> <li>• <b>Hendon Station (Policy GSS09);</b></li> <li>• West Hendon Estate (Policy GSS10);</li> <li>• New Southgate Opportunity Area<sup>27</sup> (Policy GSS09);</li> <li>• Major Thoroughfares - Edgware Road (A5) and Great North Road (A1000) (Policy GSS11); and the</li> <li>• Town Centres of Finchley Central and North Finchley (Policy GSS08)'</li> </ul>
REP327	ID087	Sanjay Maraj	CDH04	<ol style="list-style-type: none"> <li>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"</li> <li>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.</li> <li>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</li> <li>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?</li> <li>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</li> </ol> <ol style="list-style-type: none"> <li>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</li> <li>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</li> </ol>

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				<p>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.</p> <p>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> <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>
REP328	ID029	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>
REP329	ID027	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.</p> <p>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>
REP330	ID139	Theresa Villiers	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</p>

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		MP		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 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.
REP331	ID134	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.
REP332	ID009	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.
REP333	ID010	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: <a href="https://www.nationalparkcity.london/frontgardens">https://www.nationalparkcity.london/frontgardens</a> and <a href="https://frontgardens.nationalparkcity.org/">https://frontgardens.nationalparkcity.org/</a> 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.
REP334	ID010	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: <b>CDH07A Trees, woodland and hedges</b> 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 <b>Great North Road Hedge</b> (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

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				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.
REP335	ID029	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 "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: "...In tall buildings which fail to meet the external private amenity space standards, <b>where site constraints make it difficult to provide private outdoor open space that offers good amenity for all units, additional internal living space...</b> " "...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..." In order to be consistent with the requirements of the London Plan, Part iii. Of Draft Policy CDH07 should be adjusted as follows: "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 <b>of at least 10%</b> , either within the development site or off site and in accordance with Policy ECC06"
REP336	ID103	Oakfield House, Burtonhole Lane, Mill Hill	CDH08	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.
REP337	ID068	Historic England	CDH08	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.
REP338	ID021	Brad Blitz	CDH08	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-



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				<p>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.  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 18<sup>th</sup> and 19<sup>th</sup> 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-18<sup>th</sup> Century brick and timber buildings destroyed, as developers ripped out beams and walls.</p>
REP339	ID067	Hill Residential Ltd & Trustees of The Gwyneth Will Trust & Trustees of The Gwyneth	CDH08	<p>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.</p>

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		Cowing 1968 Settlement		
REP340	ID079	KRF Services, 45 Winnington Rd N2	CDH08	<p>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.</p> <p>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 &amp; 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."</p> <p>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 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</p>

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				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 <u>unless the proposals preserve or enhance the character and appearance of the conservation area ....</u> ”
REP341	ID025	British Sign and Graphics Association	CDH09	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 resist ....except in exceptional circumstances” also be deleted for the reason we give above.
REP342	ID050	FORAB	CHD04	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 than 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.
REP343	ID047	Finchley Society	CDH07	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

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				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.
REP344	ID047	Finchley Society	CDH07 (a iii)	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.
REP345	ID085	London Historic Parks and Gardens Trust	CDH08	<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. <a href="https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/">https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/</a></p> <p><b>Local Heritage Listing: Identifying and Conserving Local Heritage</b>, 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, <b>historic parks and gardens or other designed landscapes</b> – 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 <a href="#">GoParks London</a> 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</p> <p>Detailed information on each of the 101 sites in Barnet can be accessed here: <a href="https://londongardenstrust.org/conservation/inventory/sites-in-borough/?Borough=Barnet">https://londongardenstrust.org/conservation/inventory/sites-in-borough/?Borough=Barnet</a></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>
REP346	ID085	London Historic Parks	CDH08	Insert “designed landscapes” after locally listed buildings in 1 <sup>st</sup> clause.

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		and Gardens Trust		<p>Insert “and designed landscapes” after Locally Listed Buildings and their settings in the clause headed <b>Locally Listed Buildings and Other Non-Designated Heritage Assets</b> Insert - Development proposals affecting heritage assets such as designed landscapes should</p> <ul style="list-style-type: none"> <li>protect and conserve the borough’s heritage assets of designed landscapes such as parks, gardens, squares, churchyards, cemeteries and other sites of historic interest;</li> <li>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.</li> <li>Provide landscape improvements to mitigate adverse impacts on the experience of being within the open space arising from the development.</li> </ul> <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 <b>Barnet Draft Growth Strategy 2030 Consultation</b> 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 <a href="https://londongardenstrust.org/conservation/inventory/">https://londongardenstrust.org/conservation/inventory/</a></p>
REP347	ID023	Brent Cross South Limited Partnership (‘BXS LP’),	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 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.</p>
REP348	ID047	Finchley Society	Chapter 7	<p>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.</p>
REP349	ID071	Queer The Norm Ltd and Inkluder CIC	Section 7.6	<p>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.</p> <p>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.</p>

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REP350	ID023	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 56,600m<sup>2</sup> of comparison retail floorspace; approximately 7,500 new homes, including affordable ones, and 395,000m<sup>2</sup> of new office space new commercial quarter with a forecast of over 20,000 new jobs.</i>
REP351	ID133	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.
REP352	ID034	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.
REP353	ID009	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.
REP354	ID081	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.
REP355	ID050	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.
REP356	ID058	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.
REP357	ID041	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.

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				<p>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:</p> <p><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. <u>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.</u> In addition, any proposal of more than 2,500 m<sup>2</sup> of retail, office or leisure development in an edge or out of centre location must be supported by an impact assessment.</i></p>
REP358	ID023	Brent Cross South Limited Partnership ('BXS LP'),	TOW01	<p>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></p> <p><i>i) <u>The redevelopment of Brent Cross Growth Area (see policy GSS02) <del>to</del> 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></p>
REP359	ID047	Finchley Society	TOW01, TOW02 and ECY01	<p>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.</p>
REP360	ID069	Home Builders Federation	TOW02	<p>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.</p>

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REP361	ID009	Barnet Cycling Campaign	TOW02	As recommended above, we suggest converting some unused retail units for use as cycle hubs.
REP362	ID012	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>
REP363	ID134	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.
REP364	ID023	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'.
REP365	ID110	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."
REP366	ID023	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 Growth Areas, town centres and local centres as these locations tend to be more accessible by public transport, in particular the bus network.</i>
REP367	ID115	Roger Chapman Ramblers Herts & North Middlesex	Paras 8.5.4; 10.15.4, 10.19.7	<p>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 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."</p> <p>10.15.4 "Public accessibility is also important and the ability to link into the wider network of footpaths and cycleways should be considered."</p> <p>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. The Dollis Valley Green Walk and the Capital Ring are strategic walking routes that cross Barnet.</p>
REP368	ID007	Barnet CCG	CHW02	We support the changes to Policy CHW02 Promoting health and wellbeing which now provides a comprehensive policy framework to support health and wellbeing. In particular, the policy now supports the use of developer contributions for healthcare infrastructure. The policy now clarifies the role of Health Impact Assessments (HIAs) on larger developments by providing definitions in the glossary. We suggest that further guidance on HIAs is provided in updated Information Requirements for the Validation of Planning Applications including the use of HIA tools and a recommended process to ensure that HIAs are effective.
REP369	ID092	McCarthy and Stone Retirement Lifestyles and Churchill Retirement Living	CHW02	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



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				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><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>
REP370	ID007	Barnet CCG	CHW01	We welcome Policy CHW01 Community Infrastructure and the support for new community infrastructure. However, when considering the redevelopment or disposal of surplus NHS sites we consider that the policy should be sufficiently flexible to allow the loss of a facility, or part disposal of a site, where declared surplus to requirements in accordance with service transformation and estate strategies. The redevelopment of NHS sites and the introduction of housing and other uses provides vital investment to re-invest in new and improved health facilities which are fit for purpose. This flexibility would accord with clauses F and G of London Plan Policy S1. Therefore, we suggest that a third bullet is added to read: [or] "the loss, or partial loss of a facility or site in community use is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities."
REP371	ID113	Queen Elizabeth's School	CHW01	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

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				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 <b>and promoters</b> of new and improved educational facilities within the Borough, such as those at Middlesex University's Hendon campus, <b>by affording great weight in planning decisions to the need to create, expand or alter these facilities</b>, 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: <i>"<b>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.</b>"</i> 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 legislation <sup>1</sup> that seeks to prioritise and 'fast track' planning applications for school development proposals and extend permitted development rights for school buildings.
REP372	ID009	Barnet Cycling Campaign	CHW01	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.
REP373	ID067	Hill Residential Ltd & Trustees of Gwyneth Will Trust & Gwyneth Cowing 1968 Settlement	CHW01	Fully supportive of the Publication Local Plan of ensuring that community facilities are provided for Barnet's communities.
REP374	ID081	Landsec	CHW01	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 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.
REP375	ID012	Barnet Liberal Democrats	CHW01	<ol style="list-style-type: none"> <li>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.</li> <li>2. There is no objective test of what it means to support and promote an alternative use. Again, clarity on this would be helpful.</li> </ol>

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				<p>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> <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>
REP376	ID129	Sports England	CHW01	<p>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, <u>quantity and in a suitable location</u>. 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.</p>
REP377	ID129	Sports England	CHW01	<p>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.</p>
REP378	ID023	Brent Cross South Limited Partnership ('BXS LP'),	CHW01	<p>As above, Part C should be amended as follows: <i>The Council will:</i></p> <p>a) <i>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 and Growth Areas will need robust justification;</i></p>
REP379	ID101	NHS Property Services	CHW01	<p>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</p>

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				<p>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 public sector bodies, and as a result are suitable for other uses. Sites 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:</p> <p>"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"> <li>- the replacement facility is equivalent to or better quality and meets the needs currently met by the existing facility, or</li> <li>- 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</li> <li>- 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).</li> </ul>
REP380	ID029	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.</p> <p>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:</p> <p><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></p> <ul style="list-style-type: none"> <li>• <i>It can be demonstrated that adequate alternative facilities meet the needs of the community;</i></li> <li>• <i>The replacement facility is equivalent to or better quality and meets the needs currently met by the existing facility;</i> or</li> <li>• <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</li> <li>• <i>The public benefits associated with the loss of the facility would outweigh the loss of its function".</i></li> </ul> <p>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>
REP381	ID137	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>

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REP382	ID089	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:</p> <p><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:</p> <p><u><i>"Development (including change of use) that involves the loss or replacement of existing community facilities / services will only be permitted if:</i></u></p> <ul style="list-style-type: none"> <li><u><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</i></u></li> </ul> <p><u><i>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></u></p>
REP383	ID007	Barnet CCG	Para 8.2.1	We note that community use can cover a wide range of uses as defined in para 8.2.1 of the draft plan, including healthcare.
REP384	ID026	Canal & River Trust	CHW02	<p>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).</p>
REP385	ID009	Barnet Cycling Campaign	CHW02	<p>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.</p>

Reference	Representor Reference	Representor	Section	Summary of Comments
REP386	ID059	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 (<a href="http://www.sciencedaily.com/releases/2018/06/180619122456.htm">www.sciencedaily.com/releases/2018/06/180619122456.htm</a>), we should be urging all administrations, both local and national, to save energy and reverse biodiversity decline by tackling waste light." (Chapter 3, <a href="https://britastro.org/dark-skies/pdfs/CfDS_booklet_Rev07.pdf">https://britastro.org/dark-skies/pdfs/CfDS_booklet_Rev07.pdf</a>). 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." (<a href="https://www.london.gov.uk/sites/default/files/london_environment_strategy.pdf">https://www.london.gov.uk/sites/default/files/london_environment_strategy.pdf</a>).</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: <a href="https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/">https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/</a></p> <p>Institution of Lighting Professionals Guidance Note 8 Bats and Artificial Lighting <a href="https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/">https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/</a></p> <p>Commission for Dark Skies (a section of the British Astronomical Association) Lighting Guidelines: <a href="https://www.britastro.org/dark-skies/pdfs/CfDS1703_E5_Good_Lighting_Guide.pdf">https://www.britastro.org/dark-skies/pdfs/CfDS1703_E5_Good_Lighting_Guide.pdf</a></p> <p>These measures are all easy to adopt and will offer immediate and better protection of the bio-environment and health.</p>
REP387	ID081	Landsec	CHW02	<p>Landsec continues to support LBB's ambition to promote the creation of healthy environments under Policy CHW02, and consider the redevelopment of GNLP 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.</p>
REP388	ID101	NHS Property Services	CHW02	<p>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 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.</p>
REP389	ID133	TFL (Spatial Planning)	CHW02	<p>We welcome the additional references to the Healthy Streets Approach and sustainable and active travel</p>
REP390	ID049	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 <b>the volume of biomass lost in this way each year must be significant in the Borough, and more widely, across London.</b> 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</p>

Reference	Representor Reference	Representor	Section	Summary of Comments
				<p>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><b>Suggestion 1:</b> 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><b>Suggestion 2:</b> 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>
REP391	ID012	Barnet Liberal Democrats	CHW03	<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> </ol> <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.</p> <p>Include a specific reference to a public health approach policy on youth crime.</p>
REP392	ID023	Brent Cross South Limited Partnership ('BXS LP'),	CHW03	<p>As per comments on Policy CDH01, this policy should be amended as follows: <i>The Council will:</i></p> <p><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></p>
REP393	ID064	Joe Henry	CHW04	<p>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.</p>
REP394	ID129	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"> <li>• 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).</li> <li>• 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:</li> <li>• 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.</li> <li>• Consumption of sport benefits include the wellbeing/happiness of spectators, and the national pride/feel good factor through sporting success/achievement.</li> <li>• 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. Traditional forms of employment have been changing in the last 100 years, unfortunately the perception of what employment land is, has not. The 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</li> </ul>

Reference	Representor Reference	Representor	Section	Summary of Comments
				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.
REP395	ID008	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.
REP396	ID023	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.
REP397	ID023	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>
REP398	ID119	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 <b>could</b> 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 <b>if not designed appropriately</b>. 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 led<sup>38</sup> and <b>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.</b></i>
REP399	ID023	Brent Cross South Limited	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</i>



Reference	Representor Reference	Representor	Section	Summary of Comments
		Partnership ( 'BXS LP'),		<i>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, with other employment uses being considered where it can be shown that they are able to operate without negatively impacting upon other uses.</i>
REP400	ID064	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.
REP401	ID041	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"> <li>i. The new employment use would contribute towards the Council's regeneration objectives.</li> <li>ii. Employment uses which generate high levels of movement should be located in close proximity to tier one and two roads</li> <li>iii. The new use does not have any adverse impact on residential amenity.</li> <li>iv. The site is not allocated for an alternative use including residential, education or community uses</li> </ol> <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"> <li>i. it would make effective use of the existing site and contribute towards the regeneration of the wider area;</li> <li>ii. It is well connected to the surrounding road network via the A406;</li> <li>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;</li> <li>iv. the Site is unallocated.</li> </ol> <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>
REP402	ID023	Brent Cross South Limited Partnership ( 'BXS LP'),	ECY01	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 395,000m <sup>2</sup> 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

Reference	Representor Reference	Representor	Section	Summary of Comments
				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.
REP403	ID013	Barnet Society Committee	ECY01	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.
REP404	ID119	Ropemaker Properties Ltd	ECY01	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 '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 <del>be employment led</del> 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>
REP405	ID070	Hurricane Trading Estate	ECY01	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.

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REP406	ID029	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.</p> <p>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> <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></p> <p><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>

Reference	Representor Reference	Representor	Section	Summary of Comments
				<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>
REP407	ID100	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 &amp; 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.</p> <p>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 a 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>
REP408	ID027	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>
REP409	ID023	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</p>

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		Partnership ( 'BXS LP'),		workspace requirements at paras 6.18 to 6.19, however it is only 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.
REP410	ID023	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.
REP411	ID029	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".

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REP412	ID064	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.
REP413	ID023	Brent Cross South Limited Partnership ( 'BXS LP'),	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) <del>Supporting</del> <i>Supporting New employment space <u>will be supported</u> 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>
REP414	ID098	Natural England	Chapter 10	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 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.
REP415	ID011	Barnet Labour Group	Chapter 10	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

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				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.
REP416	ID141	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>
REP417	ID111	Danielle Pollastri	Chapter 10	<p>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&amp;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.</p>
REP418	ID011	Barnet Labour Group	Chapter 10	<p>There must be more robust protection of green and open spaces and the greenbelt. The Council's Parks &amp; 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).</p>
REP419	ID109	Pinkham Way Alliance	Map 7	<p><b>3. Inconsistencies in Local Plan maps.</b> 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</p>

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				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.
REP420	ID026	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.
REP421	ID010	Barnet Green Spaces Network	<b>Sections 10.14 &amp; 10.15</b>	<b>10.14</b> 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.) <b>10.15</b> 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.
REP422	ID066	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.
REP423	ID110	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



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				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.
REP424	ID110	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.”
REP425	ID087	Sanjay Maraj	Paras 10.26.9 10.26.10	<ol style="list-style-type: none"> <li>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.</li> <li>2. This also has potential to be abused, with lower projected costs being estimated, which further dilute the contribution.</li> <li>3. This is an opportunity for transparency with the developer engaging the council and local community to evaluate their alternative local solutions.</li> </ol> <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>
REP426	ID007	Barnet CCG	ECC01	We support Policy ECC01 Mitigating Climate Change. The NHS is committed to reaching ‘net zero’ carbon by 2040 and an 80% reduction in emissions by 2028 to 2032. The report ‘Delivering a Net Zero National Health Service’ (January 2020) sets out interventions which will help the NHS decarbonise, including action to reduce emissions from the NHS estate, a move towards a sustainable model of healthcare with care closer to home, promoting less polluting travel options and preventing ill health which reduces hospital admissions.
REP427	ID069	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.
REP428	ID046	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 ( <a href="http://www.sciencedaily.com/releases/2018/06/180619122456.htm">www.sciencedaily.com/releases/2018/06/180619122456.htm</a> ), we should be urging all administrations, both local and national, to save energy and reverse biodiversity decline by tackling waste light.” (Chapter 3, <a href="https://britastro.org/dark-skies/pdfs/CfDS_booklet_Rev07.pdf">https://britastro.org/dark-skies/pdfs/CfDS_booklet_Rev07.pdf</a> ). 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.” ( <a href="https://www.london.gov.uk/sites/default/files/london_environment_strategy.pdf">https://www.london.gov.uk/sites/default/files/london_environment_strategy.pdf</a> ). 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

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				<p>growing strategy (<i>London Plan 2021 Policy G8</i>). 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] [* <i>Natural Environment and Communities Act 2006</i>]. 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 <a href="https://nbn.org.uk/wp-content/uploads/2019/09/State-of-Nature-2019-UK-full-report.pdf">https://nbn.org.uk/wp-content/uploads/2019/09/State-of-Nature-2019-UK-full-report.pdf</a> ] The Mayor of London’s paper on Biodiversity <a href="http://www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/biodiversity">www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/biodiversity</a> 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 <a href="https://www.london.gov.uk/what-we-do/environment/london-environment-strategy">https://www.london.gov.uk/what-we-do/environment/london-environment-strategy</a> 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: <a href="https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/">https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/</a> Institution of Lighting Professionals Guidance Note 8 Bats and Artificial Lighting <a href="https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/">https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/</a> Commission for Dark Skies (a section of the British Astronomical Association) Lighting Guidelines: <a href="https://www.britastro.org/dark-skies/pdfs/CfDS1703_E5_Good_Lighting_Guide.pdf">https://www.britastro.org/dark-skies/pdfs/CfDS1703_E5_Good_Lighting_Guide.pdf</a> These measures are all easy to adopt and will offer immediate and better protection of the bio-environment and health.</p>
REP429	ID127	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 starry 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>
REP430	ID068	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</p>

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				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.
REP431	ID009	Barnet Cycling Campaign	ECC01	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.
REP432	ID088	Judy Marcus	ECC01 ECC02 ECC04	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 current urgent need to save energy as our planet warms and evidence that waste light is contributory factor to the rapid decline to biodiversity ( <a href="http://www.sciencedaily.com/releases/2018/06/180619122456.htm">www.sciencedaily.com/releases/2018/06/180619122456.htm</a> ), we should be urging all administrations both local and national to save energy and reverse biodiversity decline by tackling waste light. (Chapter 3, <a href="https://britastro.org/dark-skies/pdfs/CfDS_booklet_Rev07.pdf">https://britastro.org/dark-skies/pdfs/CfDS_booklet_Rev07.pdf</a> ). 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" ( <a href="https://www.london.gov.uk/sites/default/files/london_environment_strategy.pdf">https://www.london.gov.uk/sites/default/files/london_environment_strategy.pdf</a> ). 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 201612. 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 <a href="https://nbn.org.uk/wpcontent/uploads/2019/09/State-of-Nature-2019-UK-full-report.pdf">https://nbn.org.uk/wpcontent/uploads/2019/09/State-of-Nature-2019-UK-full-report.pdf</a> ] The Mayor of London's paper on

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				<p>Biodiversity <a href="http://www.london.gov.uk/what-we-do/environment/parksgreen-spaces-and-biodiversity/biodiversity">www.london.gov.uk/what-we-do/environment/parksgreen-spaces-and-biodiversity/biodiversity</a> 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 <a href="https://www.london.gov.uk/what-we-do/environment/london-environment-strategy">https://www.london.gov.uk/what-we-do/environment/london-environment-strategy</a> 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: <a href="https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obstrusive-light-2021">https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obstrusive-light-2021</a> Institution of lighting professionals Guidance Note 8 Bats and artificial Lighting <a href="https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/">https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/</a> Commission for Dark Skies (a section of the British Astronomical Assoc) Lighting Guidelines: <a href="https://britastro.org/dark-skies/pdfs/CfDS1703_ES_Good_Lighting_Guide.pdf">https://britastro.org/dark-skies/pdfs/CfDS1703_ES_Good_Lighting_Guide.pdf</a> These measures are all easy to adopt.</p>
REP433	ID067	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>
REP434	ID046	Isabelle Ficker	ECC01 ECC02 ECC04 CHW02 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 (<a href="http://www.sciencedaily.com/releases/2018/06/180619122456.htm">www.sciencedaily.com/releases/2018/06/180619122456.htm</a>), we should be urging all administrations, both local and national, to save energy and reverse biodiversity decline by tackling waste light.” (Chapter 3, <a href="https://britastro.org/dark-skies/pdfs/CfDS_booklet_Rev07.pdf">https://britastro.org/dark-skies/pdfs/CfDS_booklet_Rev07.pdf</a>).</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.” (<a href="https://www.london.gov.uk/sites/default/files/london_environment_strategy.pdf">https://www.london.gov.uk/sites/default/files/london_environment_strategy.pdf</a>).</p> <p>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:</p>

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				<p><a href="https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/">https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/</a>            Institution of Lighting Professionals Guidance Note 8 Bats and Artificial Lighting <a href="https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/">https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/</a>            Commission for Dark Skies (a section of the British Astronomical Association) Lighting Guidelines: <a href="https://www.britastro.org/dark-skies/pdfs/CfDS1703_E5_Good_Lighting_Guide.pdf">https://www.britastro.org/dark-skies/pdfs/CfDS1703_E5_Good_Lighting_Guide.pdf</a>            These measures are all easy to adopt and will offer immediate and better protection of the bio-environment and health.</p>
REP435	ID092	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>
REP436	ID012	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>
REP437	ID008	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 process<sup>2</sup>." 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</p>

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

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				<p>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 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"> <li>• The Planning for the future white paper is clear that transition to net zero should be embedded in the planning system.</li> <li>• 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</li> <li>• The NPPF (NPPF) sets out how councils should ensure new developments are not vulnerable to climate change. BCAG recommends that in Policy ECCO1:</li> <li>• 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 policies 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.</li> <li>• 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).</li> <li>• Part f) should highlight that schemes are required to incorporate renewable energy initiatives into development proposals, where feasible, rather than the current encouraged.</li> <li>• 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.</li> <li>• 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.</li> </ul>
REP438	ID064	Joe Henry	ECCO2	<p>"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" – the wrong tables are referred to. Table 18 requires: "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." 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>

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REP439	ID110	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. 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 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 <i>Air pollution</i> 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 (though such sites as the CityAir.app) when best to negotiate Barnet's pollution hotspots."</p>
REP440	ID010	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:</p> <p><i><u>"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."</u></i></p> <p>Add new section F to Policy ECC02: Environmental Considerations <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></p>
REP441	ID064	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</p>

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				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?
REP442	ID009	Barnet Cycling Campaign	ECC02A	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.
REP443	ID045	Environment Agency	ECC02A	We <b>fully support</b> 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 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 <b>support</b> the following policy criteria: n) Buildings are not sited over the top of new or existing culverts/ordinary watercourses. Culverts



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				<p>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, <del>and</del> 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: • <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; 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&amp;3.'</i> 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.</p>
REP444	ID045	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 <b>Table 19</b> and Policy <b>ECC02A part C iii</b> 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> <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 national's 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</p>

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				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 paras 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.
REP445	ID113	Queen Elizabeth's School	ECC04	<b>The Galley Lane Sports Field</b> 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.
REP446	ID034	CPRE London	ECC04	<b>We oppose the "low value, low quality"</b> 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.
REP447	ID026	Canal & River Trust	ECC04	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.
REP448	ID009	Barnet Cycling Campaign	ECC04	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.
REP449	ID044	East Finchley Community Trust (EFCT)	ECC04	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. <b>New Park for East Finchley:</b> 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.
REP450	ID067	Hill Residential Ltd & Trustees of Gwyneth Will Trust & Gwyneth Cowing 1968 Settlement	ECC04	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

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				<p>access to open 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 ECC04 (the additions are shown underlined):</p> <p><i><u>The Council will seek to work proactively with developers to provide development which enables the provision of new public open space.</u></i></p> <p>It is considered that the above changes would ensure that draft local plan is positively prepared and justified.</p>
REP451	ID014	Barnet VCS Environmental Network.	ECC04	<p>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.</p> <p>We propose removal of this element of the policy.</p>
REP452	ID050	FORAB	ECC04	<p>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’.</p> <p>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)</p>
REP453	ID012	Barnet Liberal Democrats	ECC04	<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> </ol> <p>Modifications:</p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> </ol> <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>
REP454	ID129	Sports England	ECC04	<p>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</p>

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				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 losses 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."
REP455	ID128	Paul Smith	ECC04	<p>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 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.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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</li> </ul>
REP456	ID010	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 <b>all</b> 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>  Public Health England 2020  <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904439/Improving_access_to_greenpace_2020_review.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904439/Improving_access_to_greenpace_2020_review.pdf</a>  New Scientist 2021  <a href="https://www.newscientist.com/article/mg24933270-800-green-spaces-arent-just-for-nature-they-boost-our-mental-health-too/">https://www.newscientist.com/article/mg24933270-800-green-spaces-arent-just-for-nature-they-boost-our-mental-health-too/</a>  WHO 2016  <a href="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">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</a>  Warwick University 2019</p>

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				<a href="https://warwick.ac.uk/newsandevents/pressreleases/green_space_is/">https://warwick.ac.uk/newsandevents/pressreleases/green_space_is/</a> 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.
REP457	ID010	Barnet Green Spaces Network	ECC04	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 . 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. And again: 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 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 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.
REP458	ID013	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.
REP459	ID139	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.
REP460	ID113	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.

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REP461	ID003	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.
REP462	ID010	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.
REP463	ID098	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. 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.
REP464	ID021	Brad Blitz	ECC06	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:

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				<p>Town and Country Planning (Environmental Impact Assessment) Regulations 2017 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) EIR Reg 12(5)(3), sets out the basis for exempting information, including the requirements of a public interest test. The UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention). Article 5 - Collection and Dissemination of Environmental Information 1. Each Party shall ensure that: (a) Public authorities possess and update environmental information which is relevant to their functions; (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 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. Para 4. Each Party shall provide for early public participation, when all options are open and effective public participation can take place. Para 8. Each Party shall ensure that in the decision due account is taken of the outcome of the public participation. Article 7 - Public Participation Concerning Plans, Programmes, and Policies Relating to the Environment. 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> 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. 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. The scoping report can be found here: <a href="https://publicaccess.barnet.gov.uk/online-applications/files/37CFFD6B4AFF2183A334D4CCD25E59D3/pdf/21_2885_ESC-SCOPING_REPORT-5173347.pdf">https://publicaccess.barnet.gov.uk/online-applications/files/37CFFD6B4AFF2183A334D4CCD25E59D3/pdf/21_2885_ESC-SCOPING_REPORT-5173347.pdf</a> The determination of acceptability is available here <a href="https://publicaccess.barnet.gov.uk/online-applications/files/2CDA83B8A9C3C4FFBE00C9D1DC3D7DF8/pdf/21_2885_ESC-DN_ES_SCOPE_ACCEPTABLE-5221344.pdf">https://publicaccess.barnet.gov.uk/online-applications/files/2CDA83B8A9C3C4FFBE00C9D1DC3D7DF8/pdf/21_2885_ESC-DN_ES_SCOPE_ACCEPTABLE-5221344.pdf</a> 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. 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</p>

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				<p>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, ECCo4, 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, ECCo4, 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>
REP465	ID045	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 &amp; 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-</p>



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				<p>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> <p>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.</p>
REP466	ID039	Mary Dixon	ECC06	<p>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><i>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.</i></u></p>
REP467	ID122	Tony Sarchet	ECC06	<p>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.</p>
REP468	ID112	Mike Priaulx	ECC06	<p>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.</p>

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REP469	ID010	Barnet Green Spaces Network	ECCO6  Policies Map	<p>The plan fails to recognise B-lines, promoted by Buglife as part of the Governments National Pollinator Strategy <a href="https://www.gov.uk/government/publications/national-pollinator-strategy-for-bees-and-other-pollinators-in-england">https://www.gov.uk/government/publications/national-pollinator-strategy-for-bees-and-other-pollinators-in-england</a> 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.</p> <p><a href="https://www.buglife.org.uk/our-work/b-lines/">https://www.buglife.org.uk/our-work/b-lines/</a> 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.</p> <p>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."</p> <p>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.</p> <p>Proposals Map Add b-line extent as indicated on the website <a href="https://www.buglife.org.uk/our-work/b-lines/">https://www.buglife.org.uk/our-work/b-lines/</a> to the proposals map.</p> <p>This is a relatively new policy area that needs a proper hearing.</p>
REP470	ID134	Thames Water Utilities Ltd)	Table 19	<p>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 (<a href="https://www.thameswater.co.uk/preplanning">https://www.thameswater.co.uk/preplanning</a>). 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></p>
REP471	ID134	Thames Water Utilities Ltd	Table 20	<p>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.</p>
REP472	ID133	TFL (Spatial Planning)	Chapter 11	<p>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.</p>
REP473	ID009	Barnet Cycling Campaign	Para 11.1.1	<p>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</p>

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				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.
REP474	ID023	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.
REP475	ID023	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.
REP476	ID133	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 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.
REP477	ID023	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.
REP478	ID023	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.

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REP479	ID023	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.
REP480	ID023	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.
REP481	ID023	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.
REP482	ID023	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.
REP483	ID023	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.
REP484	ID023	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).
REP485	ID009	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.
REP486	ID023	Brent Cross South Limited Partnership ('BXS LP'),	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 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

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				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.
REP487	ID009	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.
REP488	ID009	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.
REP489	ID009	Barnet Cycling Campaign	Para 11.7.1	11.7.1 Promoting Active Travel – off-road and on-road cycle routes will be required.
REP490	ID009	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?
REP491	ID009	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.
REP492	ID009	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.
REP493	ID009	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.
REP494	ID009	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.
REP495	ID009	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"> <li>1. Providing Low Traffic Neighbourhoods (LTNs) in all residential areas by 2030, which prevent through traffic, but retain permeability for active travel (bus, walking &amp; cycling).</li> <li>2. Making 'School streets' the default arrangement, which close roads outside schools at the start and end of the school day.</li> <li>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.</li> </ol>

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				<ol style="list-style-type: none"> <li>4. Ensuring that Barnet is “Smart Road User Charging ready” by 2024 as part of a London-wide scheme.</li> <li>5. Supporting a dense network of shared mobility schemes by 2024.</li> <li>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.</li> <li>7. Develop programmes that discourage use of private vehicles, including PHVs, for journeys into, through or within Barnet.</li> <li>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"> <li>◦ Build 50% of the prioritised strategic cycling corridors (as identified in TfL’s Strategic Cycling Analysis) by 2024 and 100% by 2030.</li> <li>◦ Match other boroughs and TfL by moving to a general 20 mph speed limit.</li> </ul> </li> <li>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</li> <li>10. Improvements to Pedestrian experience with pavement widening, continuous footways, more zebra crossings and improved timings for signalled pedestrian crossings]</li> </ol>
REP496	ID067	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.
REP497	ID116	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.
REP498	ID012	Barnet Liberal Democrats	TRC01	<ol style="list-style-type: none"> <li>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).</li> <li>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.</li> <li>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</li> </ol>

Reference	Representor Reference	Representor	Section	Summary of Comments
				<p>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> <p>Modifications:</p> <ol style="list-style-type: none"> <li>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).</li> <li>We believe that supporting active transport needs to include thought for pedestrians, including 20 mph speed limits, safe pavements, benches and public toilets.</li> </ol> <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>
REP499	ID058	Hammerson UK Prop and Aberdeen Standard Investments	TRC01	<p>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.</p>
REP500	ID023	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"> <li>necessary to make the development acceptable in planning terms</li> <li>directly related to the development; and</li> <li>fairly and reasonably related in scale and kind to the development.</li> </ol> <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 <b>to include speed reduction initiatives to support the Mayor’s Vision Zero commitment</b>; and”</p> <p>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.</p> <p>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>

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REP501	ID133	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.
REP502	ID115	Roger Chapman Ramblers Herts & North Middlesex	TRC01	<b>Amend</b> - <i>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 :</i> a) <i>Promote active travel requiring all developments to address the needs of cyclists and pedestrians by ensuring :</i> <i>NB Include struck out wording in supporting text.</i>
REP503	ID034	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.
REP504	ID009	Barnet Cycling Campaign	TRC02	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. 1. Support more bus lanes and the introduction of bus gates in healthy streets neighbourhoods to make bus journeys more efficient than car journeys. 1. 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. 2. 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. 3. 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]. 4. 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].
REP505	ID050	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. 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.
REP506	ID063	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.



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REP507	ID023	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.
REP508	ID132	TFL (Commercial Development)	<b>TRC02</b>	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 <b>ticket hall building</b> and enhanced public transport interchange at Colindale;</i>
REP509	ID133	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.
REP510	ID064	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.
REP511	ID053	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.

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REP512	ID053	Friern Barnet & Whetstone Residents' Association	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> ).
REP513	ID069	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.
REP514	ID034	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.
REP515	ID009	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"> <li>1. Restricting parking on bus routes to allow free passage for buses and cyclists.</li> <li>2. Extending bus lanes on the wider main bus routes and making them operational 7 days a week.</li> <li>3. Increasing parking charges for larger and more polluting vehicles in car parks, CPZs and on street.</li> <li>4. Enforcing the ban on pavement parking.</li> <li>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.</li> <li>6. Providing car club vehicle parking where appropriate [g]</li> <li>7. Restricting the type of vehicles allowed to park in new developments to smaller and less polluting models or electric vehicles.</li> <li>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).</li> </ol>
REP516	ID067	Hill Residential Ltd & Trustees of Gwyneth Will Trust & Gwyneth	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

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		Cowing 1968 Settlement		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.
REP517	ID081	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.
REP518	ID016	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.
REP519	ID023	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:</p> <p>“The Council will expect residential development to provide parking <b>flexibly</b> 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:</p>

Reference	Representor Reference	Representor	Section	Summary of Comments
				<p><b>“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.”</b> 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 <b>or agree to a developer contribution towards the implementation and monitoring of a new or amended CPZ</b>”. 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 <b>on-street</b> car club vehicle parking along with car club membership for future residents of the development within the agreed car parking provision, <b>taking into consideration existing car club provision within the vicinity of the development.</b>” See response above to Para 11.12.9.</p>
REP520	ID132	TFL (Commercial Development)	TRC03	<p>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, <b>we consider that the text should be clear in respect of who decides whether a CPZ is required.</b> 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 <del>should be</del> 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></p>
REP521	ID133	TFL (Spatial Planning)	TRC03	<p>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 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.</p>
REP522	ID029	Clarion Housing Group and the Huntingdon Foundation	TRC03	<p>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</p>

Reference	Representor Reference	Representor	Section	Summary of Comments
				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.
REP523	ID027	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".
REP524	ID009	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.
REP525	ID125	Elizabeth Silver and 18 Co-Signatories	<b>Table 21</b>	<b>Unsound : Ambiguity contrary to NPPF 2021 para 16d</b> 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 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 <b>To make this Table Sound and remove ambiguity, add these to Table 21:</b> 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."

Reference	Representor Reference	Representor	Section	Summary of Comments												
				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."												
REP526	ID023	Brent Cross South Limited Partnership ('BXS LP'),	Table 23	<ul style="list-style-type: none"> <li>• Symbol ^ can be omitted.</li> <li>• Footnote for # should clarify what "higher density or in more accessible locations" means to avoid ambiguity.</li> <li>• Footnote "~With the exception of disabled persons parking, see <b>London Plan</b> Part G Policy T6 .1 Residential parking." This should reference that this relates to the London Plan.</li> </ul>												
REP527	ID083	LB Brent	Table 23,	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>												
REP528	ID023	Brent Cross South Limited Partnership ('BXS LP'),	Table 24	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.												
REP529	ID009	Barnet Cycling Campaign	Chapter 12	<p>The 2012 version of the Infrastructure Delivery Plan only had a few 'critical' and 'necessary' items on walking &amp; cycling for 2011-16.</p> <table border="1"> <thead> <tr> <th>Type of infrastructure</th> <th>'critical' &amp; '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 &amp; pedestrians</td> <td>£328,000</td> </tr> <tr> <td><b>Movement and connectivity total</b></td> <td><b>£131,821,000</b></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><sup>x</sup> 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	<b>Movement and connectivity total</b>	<b>£131,821,000</b>
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REP530	ID143	Whetstone Properties Ltd	Chapter 12	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												

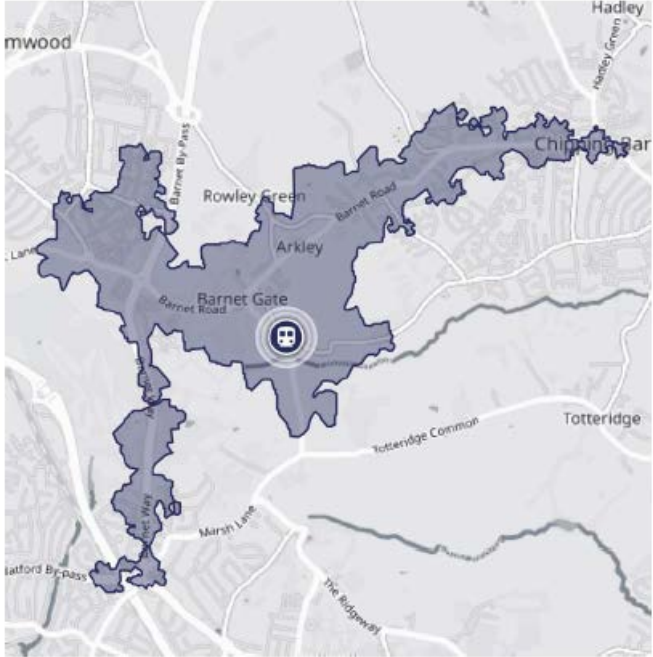
Reference	Representor Reference	Representor	Section	Summary of Comments
				<p>consider that this housing need is unsound to be used as for the Spatial Strategy for the plan. Notwithstanding this point, we also express serious concerns that the plan fails to properly identify specific and deliverable 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 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.”</i> 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 on to confirm that: <i>“...the works are anticipated to complete in 2030”</i>. 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 indicates 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</p>

Reference	Representor Reference	Representor	Section	Summary of Comments
				methodology, the Council should assess whether it meets the criteria under paras 140 and 141 of the NPPF, as outlined in our covering representation.
REP531	ID057	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.
REP532	ID119	Ropemaker Properties Ltd	Glossary – Agent of Change	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'.
REP533	ID116	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.
REP534	ID006	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.
REP535	ID006	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"> <li>1. The quality of new homes which will need radical improvement;</li> <li>2. Space standards which should be increased so that home working is easier for all;</li> </ol>



Reference	Representor Reference	Representor	Section	Summary of Comments
				<p>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;</p> <p>4. Ensuring the community infrastructure is built and enhanced at the same time as a development occurs, not years later or never at all!</p> <p>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;</p> <p>Giving local residents a much greater say in the level and scope of development in their neighbourhoods</p>
REP536	ID001	OmniState 360 Burnt Oak Broadway	Para 16 Annex 1	<p>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 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 <i>"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"</i>. 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.</p>
REP537	ID139	Theresa Villiers MP	Annex 1 – Schedule of Site Proposals	<p>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 and 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.</p>
REP538	ID016	Barratt London	Para 16.2	<p>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</p>

Reference	Representor Reference	Representor	Section	Summary of Comments
				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.
REP539	ID138	Mark Tuban	Site 33	<p>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.</p> <p>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 councils 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.</p>
REP540	ID068	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.
REP541	ID130	Berkeley Group (on behalf on St James Group Limited/St William Homes LLP	Site 21	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 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.
REP542	ID086	Mactaggart and Mickel Homes	Site Allocations	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

Reference	Representor Reference	Representor	Section	Summary of Comments
				<p>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><b>Figure 4 – 15 mins Isochrone from the Site</b></p> 
REP543	ID060	Haringey Council	Site Allocations	<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 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.</p>
REP544	ID038	Diocese of London	Site Selection	<p>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</p>

Reference	Representor Reference	Representor	Section	Summary of Comments
				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).
REP545	ID101	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.
REP546	ID132	TfL (Commercial Development)	Site 6	TfL CD appreciates the addition of the reference to improving interchange and contributing towards achieving station step free access.
REP547	ID132	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.
REP548	ID132	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.
REP549	ID068	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.
REP550	ID134	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
REP551	ID139	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.
REP552	ID007	Barnet CCG	Site 4	We note the representation from NHS Property Services clarifying the ownership of the Brunswick Park Health Centre as part of Site No.4 Osidge Library and Health Centre and support the suggested change to remove the unnecessarily prescriptive allocation of floorspace (50%) for a replacement library and health centre use. The Council and NHS are exploring options for the site and decisions regarding future healthcare requirements will be taken in accordance with NHS service and estate strategies.
REP553	ID139	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.

Reference	Representor Reference	Representor	Section	Summary of Comments
REP554	ID134	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 <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .
REP555	ID133	TFL (Spatial Planning)	Site 10	We welcome the requirement for public transport access improvements.
REP556	ID134	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 <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .
REP557	ID134	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 <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .
REP558	ID134	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 <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .
REP559	ID115	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.
REP560	ID026	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.

Reference	Representor Reference	Representor	Section	Summary of Comments
REP561	ID045	Environment Agency	Site 14	<p>We are obliged to find the inclusion of the site <b>unsound</b> 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 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: <u><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></u> 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.</p> <p>We recommend the following modifications to address the concerns raised above: (a) The <b>Sequential Test</b> should be applied. See our representation to GSS01 for further detail. (b) <del>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.</del> 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</p>

Reference	Representor Reference	Representor	Section	Summary of Comments
				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.
REP562	ID134	Thames Water Utilities Ltd	Site 14	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 <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .
REP563	ID134	Thames Water Utilities Ltd	Site 14	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 ( <a href="https://www.thameswater.co.uk/developers/larger-scale-developments/sewers-and-wastewater/adopting-a-sewer">https://www.thameswater.co.uk/developers/larger-scale-developments/sewers-and-wastewater/adopting-a-sewer</a> ). 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 approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services">https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services</a> .
REP564	ID115	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.
REP565	ID134	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 <a href="mailto:Devcon.team@thameswater.co.uk">Devcon.team@thameswater.co.uk</a> tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ
REP566	ID115	Roger Chapman	Site 15	This site lies on the Strategic Walking network. Development proposals should take the opportunity to ensure effective connectivity to this network.


Reference	Representor Reference	Representor	Section	Summary of Comments
		Ramblers Herts & North Middlesex		
REP567	ID134	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
REP568	ID139	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
REP569	ID115	Roger Chapman Ramblers Herts & North Middlesex	Site 17	Development should provide walking and cycling route through allotments to Belmont Open Space
REP570	ID134	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
REP571	ID139	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
REP572	ID134	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
REP573	ID134	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
REP574	ID115	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.
REP575	ID134	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
REP576	ID134	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



Reference	Representor Reference	Representor	Section	Summary of Comments
				email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ
REP577	ID115	Roger Chapman Ramblers Herts & North Middlesex	Site 21	Development should incorporate key footpath linkages.
REP578	ID139	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.
REP579	ID134	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
REP580	ID068	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.
REP581	ID134	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
REP582	ID121	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.
REP583	ID068	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: <a href="https://historicengland.org.uk/images-books/publications/historic-environment-and-siteallocations-in-local-plans/">https://historicengland.org.uk/images-books/publications/historic-environment-and-siteallocations-in-local-plans/</a> . 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.
REP584	ID044	East Finchley Community Trust (EFCT)	Site 24	<b>Add to Site No. 24:</b> An additional sentence is requested on the site description and development guidelines. <b>Site description.</b> “A community garden maintained by the N2 Gardeners has existed for over ten years on land adjacent to the Station.” <b>Development Guidance.</b> “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.

Reference	Representor Reference	Representor	Section	Summary of Comments
REP585	ID134	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
REP586	ID132	TFL (Commercial Development)	Site 24	We appreciate the changes that have been made to address our concerns. However, <b>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</b> (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.
REP587	ID115	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.
REP588	ID031	Combined Finchley LLP	Site 25	The site is proposed to be allocated for a majority residential development (95% of the floorspace), with the remaining 5% for commercial (office) use. The indicative capacity for the site varies between 23 and 29 units within the draft Local Plan. The justification for this use allocation is that the substation "is no longer in use for infrastructure, and this highly accessible location offers an opportunity for redevelopment ... that does not have a negative impact on the nearby town centre" <sup>1</sup> . We agree that this site is optimal for development that utilises the sustainable location (PTAL 4), and draws footfall from the locality rather than from further afield. However, the nature of the site suggests that it is more suited to a greater mix of uses than those draft allocated. Firstly, the site is host to a number of established and protected trees, as well as having varied ground levels, meaning any potential development must heed these landscape considerations. In order to maximise the preservation of the tree canopy, a smaller overall proportion of residential use on the site is required in order to lessen the post-development pressure with regards to pruning and other forms of maintenance. A higher proportion of commercial (office) use at the lower levels of any development would be more appropriate, as office space is better suited to shade and the varying topography. Secondly, the current site allocation assumes that town centre uses other than residential are not suitable at the site, in that they may have a 'negative impact' on the existing town centre. This rationale would certainly apply to out of centre locations which are purely residential in nature. However, this site occupies a position as the "entranceway" <sup>2</sup> to East Finchley town centre, which as a district centre is second in the town centre hierarchy for the borough. Indeed, Policy SD7 of the London Plan

Reference	Representor Reference	Representor	Section	Summary of Comments
				<p>acknowledges that where edge of centre locations are “<i>well integrated with the existing centre, local walking and cycle networks, and public transport</i>”<sup>3</sup>, town centre uses can be appropriate. This site fulfils all of these criteria. Further, it occupies a transitional location between the residential Bishops Avenue, and the High Road which extends north from the railway bridge. There are a number of other mixed use developments in the vicinity of the site, marking this movement from residential area to the town centre. Please see the enclosed diagram, illustrating ground floor uses in the vicinity. Clearly, in reality, the town centre extends south of the railway line, despite the current policy boundary not recognising this, and this ought to be remedied.</p> <p>Due to the landscape constraints of the site and its location on the edge of East Finchley town centre, we believe the site would best serve the area through being allocated for mixed use development comprising a lower proportion of residential and a higher proportion of other town centre uses.</p> <p>Further, while the draft Local Plan does not explicitly deal with the design of the cycle network within its policies, the allocation of this site for development necessitates the examination of the recently created cycle lane that runs alongside it. This cycle lane was extended as a response to the Covid-19 lockdown period in September 2020, as a method of promoting alternative transport methods under the Central Government’s Experimental Traffic Management Orders. These were designed as temporary installations, however, Barnet’s Long Term Transport Strategy does identify the provision of sustainable transport facilities along the A1000 as a future goal. We encourage the provision of cycle facilities along this portion of the road, however, the current cycle lane extension does not maximise cyclist amenity.</p> <p>Further, any development on the site will require a number of vehicles to have access to the site, for deliveries, servicing, and blue badge parking at least. This is made extremely difficult with the current cycle lane, which at present runs from the North, beneath the bridge and then past the substation and beyond for a very short stretch. To the other side of the road the cycle lane only begins just before Bishops Avenue in what we consider to be a very unsatisfactory manner for seasoned cyclists. An alternative approach is therefore proposed, to provide the equivalent length of cycle lane on the other side of the road. We believe the loss from shortening the cycle lane on the side of the substation will be mitigated through significant improvements to the opposite lane, and by the ability to provide a safe and well managed vehicle access to the substation site.</p> <p>Finally, we support Policy GSS09, which “<i>highlights residential led mixed-use opportunities for designed 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</i>”<sup>4</sup>.</p>
REP589	ID121	Judith Salomon	Site 25	<p>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</p>
REP590	ID134	Thames Water Utilities Ltd	Site 25	<p>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</p>

Reference	Representor Reference	Representor	Section	Summary of Comments
REP591	ID134	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
REP592	ID132	TFL (Commercial Development)	Site 25:	We appreciate the changes that have been made to address our previous concerns. The “ <i>Development timeframe</i> ” 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.
REP593	ID134	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
REP594	ID134	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
REP595	ID051	Friends of Cherry Tree Wood	Site 26	<p>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 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> 

A new proposal for land which has not previously been promoted should be examined .

Reference	Representor Reference	Representor	Section	Summary of Comments
REP596	ID007	Barnet CCG	Site 27	We support the proposed community use on Site No.27 Edgware Town Centre, but suggest that community use could be added as a proposed non-residential use to Site No.28 Edgware Underground & Bus Stations as the CCG is exploring options for new health facility in Edgware Growth Area.
REP597	ID020	Betterpride Ltd	Site 27	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" <sup>1</sup> . 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).
REP598	ID135	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:</p> <p>Site 27 <i>Minimum indicative residential capacity: 2,379</i>  Site 28 <i>Minimum indicative residential capacity: 2,317</i></p> <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.  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>

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REP599	ID134	Thames Water Utilities Ltd	Site 27	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 <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .
REP600	ID115	Roger Chapman Ramblers Herts & North Middlesex	Site 27	This site lies on the Strategic Walking network. Development proposals should take the opportunity to ensure effective connectivity to this network.
REP601	ID134	Thames Water Utilities Ltd	Site 28	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .
REP602	ID133	TFL (Spatial Planning)	Site 28	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.
REP603	ID115	Roger Chapman Ramblers Herts & North Middlesex	Site 28	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.
REP604	ID095	Mill Hill Preservation Society	Site 29:	Site 29: Landscape planting needs to be included along the motorway to screen the site. (see accompanying letter) <b>Site 29: Scratchwood Quarry NW7 3JA – Waste Management:</b> 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. Site 29: Include for screen planting alongside the motorway to limit views into the waste management site.
REP605	ID134	Thames Water Utilities Ltd	Site 3	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 <a href="mailto:Devcon.team@thameswater.co.uk">Devcon.team@thameswater.co.uk</a> tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ
REP606	ID115	Roger Chapman Ramblers	Site 3	Use the opportunity to improve walking and cycling access to the primary school and to Brunswick Park open space.

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		Herts & North Middlesex		
REP607	ID141	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>
REP608	ID124	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 cligmar 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>
REP609	ID022	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"> <li>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.</li> <li>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.</li> <li>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.</li> </ol>

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				<p>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> <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>
REP610	ID123	Peter and Tina Schindler	Site 30	<p>We are writing to you as concerned local residents of Finchley Central. 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 are planned. This is despite the fact that buildings more than 15 storeys high are not permitted unless exceptional circumstances can be demonstrated. (Policy CDH04). 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"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>e. There is a limited bus service with only Number 13 going into Central London.</li> <li>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</li> <li>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.</li> <li>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.</li> <li>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.</li> </ol> <p>Our preferred proposal would be to cancel the development entirely as it is inappropriate for Finchley Central and its environs.</p>



Reference	Representor Reference	Representor	Section	Summary of Comments
REP611	ID048	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.
REP612	ID120	Pavan Sadarangani	Site 30	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. 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.
REP613	ID140	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.
REP614	ID036	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

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				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.
REP615	ID004	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.
REP616	ID005	Ray Astle	Site 30	I don't want the tower block built, I don't believe it to be useful at the location it would be built (next to the station). It would mean that some would live in the shade the whole time. Also, I don't believe that the effort and disruption to 'normal' life is worth what it would give back.
REP617	ID134	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
REP618	ID108	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.
REP619	ID142	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: - 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 - Remove the ability for 'Very Tall Buildings' to be considered for development - 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
REP620	ID114	Tamara and Michael Rabin	Site 30	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 <b>Our reasons</b>

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				<ol style="list-style-type: none"> <li>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.</li> <li>2. Barnet policy only permits the construction of buildings over 15 storeys high when there are exceptional circumstances (Policy CDH04). 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.</li> <li>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.</li> <li>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.</li> <li>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</li> <li>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</li> <li>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</li> <li>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</li> <li>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</li> <li>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.</li> <li>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.</li> <li>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</li> </ol> <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>

Reference	Representor Reference	Representor	Section	Summary of Comments
REP621	ID072	Carolyn Ison	Site 30	<p>I <b>strongly object</b> 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 <b>knock on effects</b> 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. <b>Reducing the size of the car park</b> 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 <b>raft of problems frequently associated with tower blocks</b>. 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 <b>almost impossible to find an NHS GP or an NHS dentist</b> in the area and a <b>dearth of primary school places</b>. <b>Parking</b> 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 <b>community square is unnecessary</b> 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. <b>It would not foster an increase in community spirit</b>. 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 <b>more litter</b> and Barnet have a problem clearing away our litter and waste already without more residents in an <b>already over-crowded</b> 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 <b>Conservation Area</b> - many new blocks have already been built in the area. Has Barnet Council considered the question of density? There will also be a <b>loss of light and sun</b> when these hideous giant towers are erected, not to mention <b>traffic congestion</b> on a main north/south road which is almost at a fullstop for most of the time causing <b>pollution</b> 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>
REP622	ID145	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"> <li>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.</li> <li>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.</li> <li>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.</li> </ol>


Reference	Representor Reference	Representor	Section	Summary of Comments
				<p>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.</p> <p>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> <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>
REP623	ID133	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.
REP624	ID073	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.
REP625	ID104	Sara and Leor Okrent	Site 30	<p>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.</p> <p>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.</p> <p>We urge the council to reconsider this development which we think has the potential to utterly ruin this area.</p>
REP626	ID115	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.
REP627	ID132	TFL (Commercial Development)	Site 30:	<p>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. <b>The site address is incorrect</b>; in particular the reference to Squires Lane. It should be amended, we would suggest: <del>Squires Lane</del> / <b>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)</b> 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. <b>Therefore, the allocation should</b></p>

Reference	Representor Reference	Representor	Section	Summary of Comments
				<p><b>include sufficient flexibility to enable provision of both tall and very tall building/s.</b> The “Proposed uses” still includes reference to: <i>50% residential uses with 50% retained transport infrastructure, commercial uses and car parking</i> <b>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.</b> 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. <b>[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.</b></p> <p>This clarification would be ‘sound’.</p>
REP628	ID139	Theresa Villiers MP	Site 30	<p>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.</p> <p>I believe that the site set out above should be withdrawn from the Schedule of Site Proposals.</p>
REP629	ID134	Thames Water Utilities Ltd	Site 31	<p>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</p>
REP630	ID132	TFL (Commercial Development)	Site 31	<p>TfL CD appreciates the amendments made in response to our Reg 18 representations</p>
REP631	ID090	James Masters	Site 32	<p>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?</p>
REP632	ID134	Thames Water Utilities Ltd	Site 32	<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>
REP633	ID134	Thames Water Utilities Ltd	Site 33	<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 <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>.</p>
REP634	ID133	TFL (Spatial Planning)	Site 33	<p>We welcome the use of residents’ only parking controls to ensure that there is no ‘overspill’ parking.</p>

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REP635	ID134	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
REP636	ID134	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 <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .
REP637	ID134	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
REP638	ID134	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 <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .
REP639	ID134	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 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
REP640	ID134	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 <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .
REP641	ID134	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

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REP642	ID057	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 Dwellinghouses (Class C3) 5 units.
REP643	ID134	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 <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .
REP644	ID134	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 <a href="mailto:Devcon.team@thameswater.co.uk">Devcon.team@thameswater.co.uk</a> tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ
REP645	ID134	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 <a href="mailto:Devcon.team@thameswater.co.uk">Devcon.team@thameswater.co.uk</a> tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ
REP646	ID101	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



Reference	Representor Reference	Representor	Section	Summary of Comments
				 <p data-bbox="770 703 2087 1171">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.</p> <p data-bbox="770 1011 2087 1171">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 <b>NHSPS own the freehold for the Brunswick Park Health Centre.</b> We respectfully request that the ownership status of the site is amended to reflect NHSPS’ ownership of part of the site.</p>
REP647	ID115	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.
REP648	ID007	Barnet CCG	Site 40	We note that there are eight site allocations in Hendon / The Burroughs area (sites nos 34-42). The CCG has been in discussion with the Council regarding the potential for health use as part of Hendon Hub proposals and support the proposed community use allocated on the Meritage Centre site (Site no 40).

Reference	Representor Reference	Representor	Section	Summary of Comments
REP649	ID068	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.
REP650	ID134	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 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 <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .
REP651	ID134	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 <a href="mailto:Devcon.team@thameswater.co.uk">Devcon.team@thameswater.co.uk</a> tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ
REP652	ID134	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 <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .
REP653	ID134	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 <a href="mailto:Devcon.team@thameswater.co.uk">Devcon.team@thameswater.co.uk</a> tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ
REP654	ID134	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 <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .
REP655	ID134	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

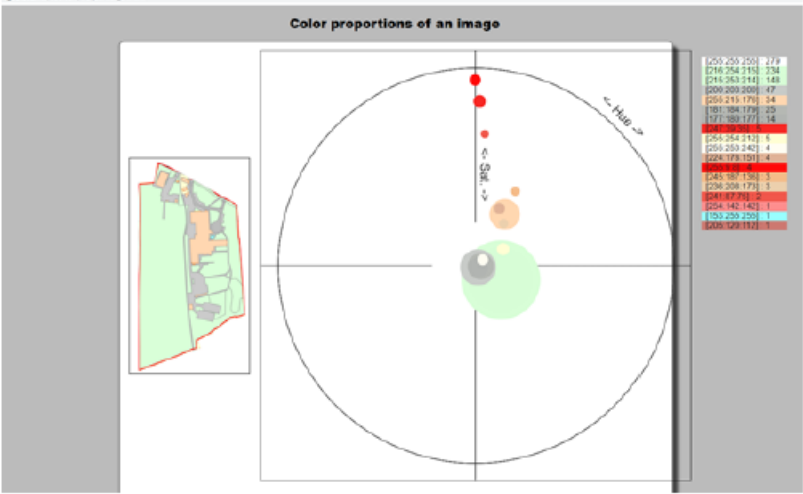
Reference	Representor Reference	Representor	Section	Summary of Comments
				email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ
REP656	ID134	Thames Water Utilities Ltd	Site 43	On the information 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
REP657	ID074	Helen James and Tom Hearnden	Site 43	<p>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 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.</p>
REP658	ID133	TFL (Spatial Planning)	Site 43	Any improvements to road junctions should follow the Healthy Streets Approach.
REP659	ID139	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
REP660	ID134	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

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REP661	ID132	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 <b>“Development timeframe” should be brought forward to the next five years.</b> In our view the <b>description of “Proposed uses / allocation (as a proportion of floorspace)” is currently unsound because it is unclear and unfeasible.</b> As currently written, it suggests that 25% of the floorspace of the development should be provided as “commercial uses”; it is not clear whether the “public realm and public car parking” also falls within the 25%. <i>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”: <del>75% Residential-led with floorspace with 25% commercial uses, public realm and limited commuter public car parking</del> <b>reflecting the site’s highly accessible location and encouraging the use of public transport and active modes of travel.</b> <del>Designated within UDP (2006) as Site 26 supporting B1 uses, hotel and leisure.</del> We have also deleted the reference to the UDP as it is out-of-date and no longer relevant.
REP662	ID013	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.
REP663	ID133	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.
REP664	ID115	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)
REP665	ID139	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.
REP666	ID113	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.
REP667	ID067	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.

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				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.
REP668	ID134	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
REP669	ID013	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.
REP670	ID139	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.
REP671	ID134	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
REP672	ID095	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

Reference	Representor Reference	Representor	Section	Summary of Comments
				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.
REP673	ID133	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.
REP674	ID115	Roger Chapman Ramblers Herts & North Middlesex	Site 46	Footpath connectivity across this site should be explored and provided.
REP675	ID134	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 <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .
REP676	ID134	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 <a href="mailto:Devcon.team@thameswater.co.uk">Devcon.team@thameswater.co.uk</a> tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ
REP677	ID132	TFL (Commercial Development)	<b>Site 47</b>	TfL CD appreciates the amendments made in response to our Reg 18 representations. However, we would suggest changes to the " <i>Proposed Use</i> " to be consistent with the approach to re-provision of commuter car parking on TfL sites (and therefore sound): <i>"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."</i>
REP678	ID125	Elizabeth Silver and 18 Co- Signatories	Site 47	<b>1. Non-Compliance with Duty to Cooperate, with Mayor and TfL</b> The Mayor's comments have been disregarded. From Appendix B Reg 18 Schedule of Representations & Responses p.10: " <b>The Mayor</b> 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 ". <b>TfL</b> says the same on p. 195. <b>TfL</b> 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." <b>2. Unsound and Not Legally Compliant Contravention of London Plan Policies T3 and T5:</b> 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.

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				<p>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.</p> <p>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 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><b>To Legally Comply with London Plan Policies T3 and T5 and to make Sound:</b> 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>
REP679	ID115	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
REP680	ID134	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
REP681	ID096	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 <b>92.88% of the current site is undeveloped green belt.</b> [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 <b>91.4% of the site is undeveloped green belt</b> [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 "<b>Development should not extend beyond the existing footprint of the buildings</b> 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, <b>para 3 of GSS07 was not revised</b> 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: <a href="https://web.archive.org/web/20210725180220/https://ibsaproperty.com/properties/watchtower-house/">https://web.archive.org/web/20210725180220/https://ibsaproperty.com/properties/watchtower-house/</a> and <a href="https://ibsaproperty.com/properties/watchtower-house/">https://ibsaproperty.com/properties/watchtower-house/</a></p>

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				<p>[2] Source: <a href="https://web.archive.org/web/20210725180417/https://ibsaproperty.com/properties/conf-centre-and-open-field/">https://web.archive.org/web/20210725180417/https://ibsaproperty.com/properties/conf-centre-and-open-field/</a> and <a href="https://ibsaproperty.com/properties/conf-centre-and-open-field/">https://ibsaproperty.com/properties/conf-centre-and-open-field/</a></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: <a href="https://www.london.gov.uk/sites/default/files/PAWS/media_id_491869/Mayor%20Response%20Barnet%20Reg%2018%20final.pdf">https://www.london.gov.uk/sites/default/files/PAWS/media_id_491869/Mayor%20Response%20Barnet%20Reg%2018%20final.pdf</a></p> <p>[5] Source: <a href="https://barnet.moderngov.co.uk/documents/s65265/Appendix%20B%20-%20Barnets%20Local%20Plan%20Schedule%20of%20Representations%20and%20Responses%20to%20Preferred%20Approach%20.pdf">https://barnet.moderngov.co.uk/documents/s65265/Appendix%20B%20-%20Barnets%20Local%20Plan%20Schedule%20of%20Representations%20and%20Responses%20to%20Preferred%20Approach%20.pdf</a></p>  <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>
REP682	ID096	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 <b>footprint of the buildings</b> and should not impact the openness of the Green Belt" etc.</p>
REP683	ID076	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>



Reference	Representor Reference	Representor	Section	Summary of Comments
REP684	ID089	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 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"> <li>• There is a clear need for SOPH as shown in the Local Plan targets and LBB evidence base;</li> <li>• 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;</li> <li>• The site is well located to have access to the services within the Mill Hill local centre, to the south of the site;</li> <li>• The site is well served by Public Transport: <ul style="list-style-type: none"> <li>○ 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;</li> <li>○ The 240 Bus Route stops outside of the site, along The Ridgeway, and runs between Golders Green and Edgware Stations; and</li> <li>○ 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.</li> </ul> </li> </ul>

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				<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; (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); (3) Kingdom Hall: conference and meeting facility; and (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 &amp; including a printery, accommodation units, offices, a communal dining room, audio-visual studios &amp; recreational facilities together with on-site parking, a new roundabout on the B1007 &amp; 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); 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</p>

Reference	Representor Reference	Representor	Section	Summary of Comments
				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
REP685	ID134	Thames Water Utilities Ltd	Site 49	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
REP686	ID126	Geoffrey Silver	Site 49	<p>1. The proposal for Green Belt and Conservation Area Site No. 49 Watch Tower House &amp; Kingdom Hall is not legally compliant with The London Plan of March 2021.</p> <p>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"> <li>• Policy G2 (Green Belt) para A1: "development proposals that would harm the Green Belt should be refused except where very special circumstances exist"</li> <li>• Para 8.2.1: "The Mayor strongly supports the continued protection of London's Green Belt."</li> <li>• Para 8.2.2: "Openness and permanence are essential characteristics of the Green Belt"</li> <li>• Policy G6 (Biodiversity) paras A, B1 and B3: <ul style="list-style-type: none"> <li>A: "Sites of Importance for Nature Conservation (SINCs) should be protected", relevant because Site 49 is contiguous with the Drivers Hill SINC.</li> <li>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.</li> </ul> </li> <li>• Policy G6 (continued): <ul style="list-style-type: none"> <li>B3: "... support the protection and conservation of priority species", relevant at the least to badgers photographed in Bittacy Park Avenue gardens, and barn owls.</li> </ul> </li> <li>• 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.</li> </ul>

Reference	Representor Reference	Representor	Section	Summary of Comments
				<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 &amp; Kingdom Hall is unsound with respect to the NPPF of July 2021.</p> <p>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"> <li>• 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.</li> <li>• Chapter 13 (Protecting Green Belt), paras 137, 138, 140, 147 and 149: <ul style="list-style-type: none"> <li>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."</li> <li>138: "Green Belt serves five purposes:" <ul style="list-style-type: none"> <li>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.</li> <li>d) "to preserve the setting and special character of historic towns", in this case the Conservation Area of historic Mill Hill Village.</li> </ul> </li> <li>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.</li> <li>147: "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances."</li> <li>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"> <li>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"</li> <li>149 (continued): <ul style="list-style-type: none"> <li>d) "the replacement of a building, provided the new building is ... not materially larger than the one it replaces;</li> </ul> </li> </ul> </li> </ul> </li> <li>• 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.</li> <li>• 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.</li> </ul>
REP687	ID126	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"> <li>• 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.</li> <li>• 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.</li> <li>• Adjust the indicative residential capacity down to one which does not extend the footprint, scale, massing and roof height beyond the existing building.</li> </ul> <p>For consistency, corresponding adjustments will also be needed in:</p>

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				<ul style="list-style-type: none"> <li>• 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.</li> <li>• Map 3E Mill Hill East Area: remove site 49 from this Growth Area map.</li> <li>• Policy GSS07: remove the semi-rural site "Watchtower House" from the para 3 list of sites for suburban growth.</li> </ul>
REP688	ID125	Elizabeth Silver and 18 Co-Signatories	<b>Site 49</b>	<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> <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 &amp; 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 &amp; 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: <math>7.1 \% = (4571 + 501) / (32,629 + 38,565)</math>  <a href="https://ibsaproperty.com/properties/watchtower-house/">https://ibsaproperty.com/properties/watchtower-house/</a>  <a href="https://ibsaproperty.com/properties/conf-centre-and-open-field/">https://ibsaproperty.com/properties/conf-centre-and-open-field/</a>  "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>

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REP689	ID115	Roger Chapman Ramblers Herts & North Middlesex	Site 49	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 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.
REP690	ID095	Mill Hill Preservation Society	Site 49:	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 6 <sup>th</sup> August 2021 for further detail. <b>Site 49: Watchtower House &amp; Kingdom Hall, The Ridgeway NW7 1RS/1RL</b> – 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 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. <b>Summary</b> 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. <b>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.</b>
REP691	ID101	NHS Property Services	Site 5	Montagu Evans LLP acts on behalf of NHS Property Services ('NHS PS') in respect of Edgware Community Hospital ('ECH'; <b>Figure 1</b> ). 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

Reference	Representor Reference	Representor	Section	Summary of Comments
				<p>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. <b>Commitment to the Provision of Healthcare Floorspace at ECH</b> 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><b>(a) ‘Not Justified’</b> 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><sup>1</sup> 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"> <li><input type="checkbox"/> time savings for patients and staff – enabling everyone to be more productive;</li> <li><input type="checkbox"/> improved infection control – a significant consideration in improving patient outcomes;</li> <li><input type="checkbox"/> reducing the need to travel (and thus improving congestion and air quality);</li> <li><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.</li> </ul> <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>(b) ‘Not Consistent with National Policy’</b> 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><b>4. Requested Changes</b> To address the above issues, we respectfully request that the following change be made to the draft site allocation: Delete the following: <b>Proposed uses / allocation (as a proportion of floorspace):</b> <del>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.</del></p>

Reference	Representor Reference	Representor	Section	Summary of Comments
				<p>Replace with:</p> <p><b>Proposed uses / allocation:</b> 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 <b>450 to 500 dwellings</b>). 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> <ul style="list-style-type: none"> <li><input type="checkbox"/> update the site's area – the area shown on Figure 1 is 4.15 ha;</li> <li><input type="checkbox"/> replace the red line boundary plan with Figure 1;</li> <li><input type="checkbox"/> correct the spelling of 'Burnt Oak' in 'Site Description';</li> <li><input type="checkbox"/> correct the spelling of 'metre' in 'Site requirements and development guidelines';</li> <li><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;</li> <li><input type="checkbox"/> correct the 'Site Description' to reflect actual building heights:  <del>An NHS hospital on a relatively low density site, with buildings of 1-2 storeys</del>  An NHS hospital on a relatively low-density site, with buildings of 1-5 storeys  <del>To the north and south are 3-4 storey residential blocks</del>  To the north and south are 3-6 storey residential blocks</li> <li><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.</li> </ul>
REP692	ID007	Barnet CCG	Site 5	We note the representation submitted by Montagu Evans on behalf of NHS Property Services for Site No. 5 Edgware hospital. We support the suggested change to remove the unnecessarily prescriptive allocation of floorspace (75%) to be retained for hospital use. Flexibility is required to take account of future service requirements and the aim to optimise the use of the current site.
REP693	ID045	Environment Agency	Site 5	We are obliged to find the inclusion of the site <b>unsound</b> 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 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



Reference	Representor Reference	Representor	Section	Summary of Comments
				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 <b>Sequential Test</b> should be applied. See our representation to GSS01 for further detail. b) We recommend the following <b>modifications</b> 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 SINCE 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.
REP694	ID115	Roger Chapman Ramblers Herts & North Middlesex	Site 5	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. 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.
REP695	ID134	Thames Water Utilities Ltd	Site 50	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .
REP696	ID134	Thames Water Utilities Ltd	Site 50	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 <a href="mailto:Devcon.team@thameswater.co.uk">Devcon.team@thameswater.co.uk</a> tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ
REP697	ID132	TFL (Commercial Development)	<b>Site 50</b>	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.
REP698	ID115	Roger Chapman Ramblers Herts & North Middlesex	Site 50	This site lies on 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 local connectivity on foot.

Reference	Representor Reference	Representor	Section	Summary of Comments
REP699	ID134	Thames Water Utilities Ltd	Site 51	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
REP700	ID134	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
REP701	ID139	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
REP702	ID134	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
REP703	ID132	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. <b>Need for additional operational facilities</b> 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> <b>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.</b> 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. <b>Need for a comprehensive development approach</b> 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.</i> Station functions must be maintained. <b>Landowners should work with TfL and the Council to identify a comprehensive scheme.</b> 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.

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				<p><b>Percentage of land uses</b> 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. Site capacity figures</i> 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></p>
REP704	ID133	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.
REP705	ID115	Roger Chapman Ramblers Herts & North Middlesex	Site 53	This site lies near to the Strategic Walking network. Development proposals should take the opportunity to ensure effective connectivity to this network
REP706	ID018	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 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). 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</p>

Reference	Representor Reference	Representor	Section	Summary of Comments
				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 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.
REP707	ID134	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
REP708	ID132	TfL (Commercial Development)	Site 55	TfL CD appreciates the amendments made in response to our Reg 18 representations. <b>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".</b> We suggest it is amended: <i>Residential with 20% limited re-provision of car parking reflecting the site's highly accessible location and encouraging the use of public transport and active modes of travel.</i>
REP709	ID133	TfL (Spatial Planning)	Site 55	We support the continuation (and if necessary, extension) of local parking controls.
REP710	ID139	Theresa	Site 55	Woodside Park station - Opposed because of the overdevelopment this would involve.

Reference	Representor Reference	Representor	Section	Summary of Comments
		Villiers MP		I believe that the site set out above should be withdrawn from the Schedule of Site Proposals
REP711	ID082	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.
REP712	ID030	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 <b>attached plan</b> , 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 <b>Tree Preservation Order</b> . 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.
REP713	ID099	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 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

Reference	Representor Reference	Representor	Section	Summary of Comments
				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..
REP714	ID134	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
REP715	ID134	Thames Water Utilities Ltd	Site 56	There are easements and/or wayleaves running through the site boundary.
REP716	ID132	TfL (Commercial Development)	<b>Site 56</b>	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.
REP717	ID115	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.
REP718	ID139	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
REP719	ID134	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
REP720	ID134	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
REP721	ID134	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
REP722	ID037	Hari Dhanji	Site 6	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.

Reference	Representor Reference	Representor	Section	Summary of Comments
				<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ol>
REP723	ID045	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 (in principle) 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</p>

Reference	Representor Reference	Representor	Section	Summary of Comments
				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.
REP724	ID134	Thames Water Utilities Ltd	Site 6	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 <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .
REP725	ID133	TFL (Spatial Planning)	Site 6	We welcome the potential requirement for planning contributions towards station improvements, including step free access.
REP726	ID115	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.
REP727	ID134	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 <a href="mailto:Devcon.team@thameswater.co.uk">Devcon.team@thameswater.co.uk</a> tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ
REP728	ID134	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 <a href="mailto:Devcon.team@thameswater.co.uk">Devcon.team@thameswater.co.uk</a> tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ
REP729	ID134	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.
REP730	ID133	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
REP731	ID075	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



Reference	Representor Reference	Representor	Section	Summary of Comments
				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.
REP732	ID134	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
REP733	ID075	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.
REP734	ID087	Sanjay Maraj	Site 62	<ul style="list-style-type: none"> <li>• A tall building on this site contravenes several of the council strategy/policies described in the plan</li> <li>• 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.</li> <li>• The perimeter of the Tesco car park provides a vital wildlife corridor</li> <li>• 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</li> <li>• 6.18.10 – medium builds are more sustainable than tall buildings</li> <li>• 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</li> <li>• 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).</li> <li>• 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.</li> <li>• The site fails to meet the criteria as specified in 16.1.4.</li> <li>• Remove this as a potential development site for tall buildings</li> </ul>

Reference	Representor Reference	Representor	Section	Summary of Comments
REP735	ID133	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.
REP736	ID134	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 <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .
REP737	ID134	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 <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .
REP738	ID134	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 <a href="mailto:Devcon.team@thameswater.co.uk">Devcon.team@thameswater.co.uk</a> tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ
REP739	ID134	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 <a href="mailto:Devcon.team@thameswater.co.uk">Devcon.team@thameswater.co.uk</a> tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ
REP740	ID134	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 <a href="mailto:Devcon.team@thameswater.co.uk">Devcon.team@thameswater.co.uk</a> tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ
REP741	ID134	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 <a href="mailto:Devcon.team@thameswater.co.uk">Devcon.team@thameswater.co.uk</a> tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ
REP742	ID133	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.'
REP743	ID115	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.

Reference	Representor Reference	Representor	Section	Summary of Comments
REP744	ID134	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 <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .
REP745	ID134	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
REP746	ID068	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).
REP747	ID134	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 <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .
REP748	ID134	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
REP749	ID035	Railway Terraces Residents Association	Site 8	<b>IT IS NOT LEGALLY COMPLIANT</b> - 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 <b>and their settings by being sympathetic to their form, scale, materials and architectural detail</b> . 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. <b>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.</b> 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

Reference	Representor Reference	Representor	Section	Summary of Comments
				<p>'Very Tall' towers (19 x 2, 18, 17, 16 and 15 storeys) in the B&amp;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><b>IT IS NOT SOUND</b> 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&amp;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&amp;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&amp;Q development will bring that to breaking point.</p> <p><b>IT IS NOT COMPLIANT WITH THE DUTY TO CO-OPERATE</b> 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&amp;Q site. An exhibition should have been mounted in the B &amp; 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&amp;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>
REP750	ID045	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) <b>is unsound</b> 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</i></p>

Reference	Representor Reference	Representor	Section	Summary of Comments
				<p><i>to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; 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. Colindeep Lane also suffers regularly from surface water flooding. Also, para 156 makes an important point about SFRA's, 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.</i></p>
REP751	ID144	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 &amp; southern end of Colindale Park is approx. 10 minutes on foot. The proposed pedestrian &amp; cycle route between the Northern Line &amp; the Silkstream would have minimal impact on an already short journey; - access between Rushgrove Park &amp; Colindale Avenue (at the northern end of Colindale Park) will already be improved by the proposed pedestrian &amp; cycle route under the Northern Line linking Colindale Gardens to Colindeep Lane. This reduces any justification for the proposed pedestrian &amp; cycle route between the Northern Line &amp; 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></p> <p>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 &amp; footpaths that have / will be built on the adjacent Colindale Gardens site which already bring similar benefits to what is proposed.</p>
REP752	ID134	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</p>

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				delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .
REP753	ID134	Thames Water Utilities Ltd	Site 9	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 <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .
REP754	ID080	Rohit Kumar	Site 9	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 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.

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REP755	ID115	Roger Chapman Ramblers Herts & North Middlesex	Site 9	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.
REP756	ID107	Donato Peduzzi	Site 9	Lack of duty to co-operate. There has been a total failure to consult directly with all interested parties, namely those residents whose properties border on to the proposed development and who would be adversely affected. No initial assessment was obtained from them. Soundness: any redevelopment of Site 9 and/or surrounding secluded woodland, part of which is already a 'site of Borough Importance for Nature Conservation', would destroy the existing natural habitat forever. This would be in contravention to all Biodiversity legislation/regulations covering environmental damage, conservation of habitats and species, protection of wild birds and natural environments. This confined space cannot sustain both a residential complex and a natural conservation area. This entire site should be protected by a Nature Preservation Order. The build of 128 residential units in such a confined space will seriously encroach on our privacy and security. Please see the attached petition which lays out our case in further detail for objecting to and preventing any physical on-site feasibility study and subsequent redevelopment of Site No.9 of the Colindale Growth Area proposal in the Barnet Draft Local Plan. We petition for the permanent removal of Site No. 9 as a possible redevelopment area from this draft proposal and any future submissions. We petition for the protection of the entire secluded woodland from the banks of the Silkstream/Burnt oak Brook to the railway boundary of the Northern Line. It must all come under the Borough's 'Site of Importance for nature Conservation' as defined by its current layout and without any 'human' access into the woodland as is the current situation. Furthermore we petition that the Barnet 'Green Chain' (a pedestrian/cycle thoroughfare) should not extend through this unique woodland.
REP757	ID081	Landsec	Site 67	Landsec continues to strongly support the allocation of the site for comprehensive or infill residential-led development. As a means of context, GNLPS 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 6 surface 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 GNLPS 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

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				<p>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 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 repositioning 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"> <li>• Connect the neighbourhood physically via access points and pathways, and visually to the surrounding area, and maximise the potential of orientation, aspect and views.</li> <li>• 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.</li> <li>• Use efficient building forms that successfully integrate residential uses with other uses and optimise residential quality.</li> </ul> <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</p>



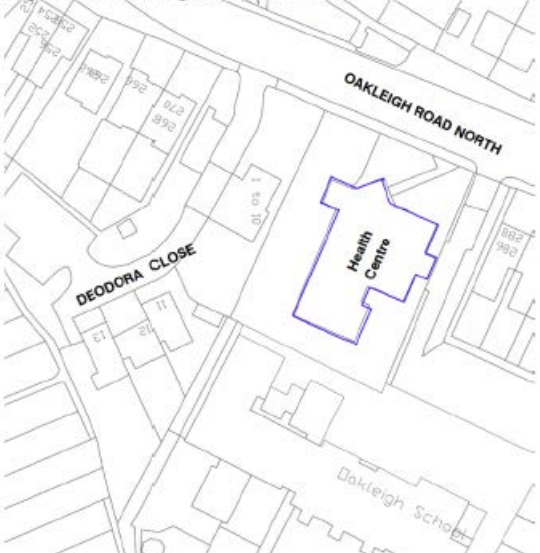
Reference	Representor Reference	Representor	Section	Summary of Comments
				adjacent MOL. The Vale of Health development typology offers opportunity to introduce ecological and biodiverse landscapes, areas of public realm, high quality-built form with a range of uses and connection to the neighbouring 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.
REP758	ID132	TFL (Commercial Development)	Site 27 Site 28	<p>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, <b>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 Centre, it is considered that they should be incorporated into one site allocation.</b> 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><b>Site capacity figures</b> 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 <b>minimum</b> residential capacity: 2,379</i>  <i>Site 28: Indicative <b>minimum</b> residential capacity: 2,317</i></p> <p><b>Uses as a percentage of floorspace</b> 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. <b>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.</b> 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 <del>30% mixed uses (transport, retail, office and community)</del>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>
REP759	ID040	John Doherty	Site 34 Site 35 Site 36 Site 38 Site 39 Site 40 Site 41 Site 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</p>

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				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.
REP760	ID106	Rajesh Patel	Site 34 Site 35 Site 36 Site 38 Site 39 Site 40 Site 41 Site 42	<ul style="list-style-type: none"> <li>• Provision suggested in Local Plan has singular agenda in creating University campus in a suburban residential setting.</li> <li>• 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</li> <li>• This would result in dramatically alter the demographic of the area, so much as to be detrimental, replacing established residential neighbourhoods with transient ones.</li> <li>• If Middlesex University is allowed to dominate the area, Hendon residents will be excluded from every single civic building on The Burroughs.</li> <li>• 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.</li> <li>• Plans do not follow advice given by Historic England and would cause significant harm to heritage and conservation areas.</li> <li>• The ONLY potential development site to be completely removed from plans Middlesex University’s own car park.</li> <li>• Benefits for residents are still undefined.</li> <li>• Loss of parking for residents in Fuller Street , their visitors and tradesmen</li> <li>• 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).</li> <li>• There is no up- to-date parking survey.</li> <li>• There is no mention of parking provision for current or future residents.</li> <li>• Moving the PDSA on the Fuller Street car park will creat additional parking pressure on Fuller Street would negatively impact residents</li> <li>- Local school children would be put risk during pick up and drop off</li> <li>- 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.</li> <li>- Overlooking/Loss of privacy</li> <li>- Noise and disturbance resulting from use</li> <li>- Safety from various animals</li> <li>• More than 17 privately owned buildings will be compulsorily purchased, and tenants forcibly moved out of their homes.</li> <li>• There is ample opportunity for Middlesex University to develop its campus within its own footprint</li> <li>• 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</li> </ul>
REP761	ID117	Kathleen Richardson	Site 34 Site 35 Site 36 Site 38 Site 39 Site 40 Site 41 Site 42	<p>Provision suggested in the Local Plan has the singular aim of creating a University campus in a suburban, residential setting.</p> <p>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.</p> <p>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</p>

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				<p>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 than 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>
REP762	ID118	Sharon Rind	Site 34 Site 35 Site 36 Site 38 Site 39 Site 40 Site 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..</p> <p>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"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• If Middlesex is allowed to dominate the area, Hendon residents will be excluded from every single civic building on The Burroughs.</li> <li>• 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.</li> <li>• Plans do not follow advice given by Historic England, and could cause significant harm to heritage and conservation areas.</li> <li>• The only potential development site to be completely removed from plans is Middlesex University's own car park. (Site 37)</li> <li>• Benefits for residents are still undefined.</li> <li>• Loss of parking for clients and customers would irrevocably damage local businesses.</li> <li>• 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.</li> <li>• This would adversely affect the local community and particularly put heritage houses at risk.</li> </ul>

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				<ul style="list-style-type: none"> <li>• 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).</li> <li>• There is no up-to-date parking survey</li> <li>• There is no mention of parking provision for current or future residents.</li> <li>• Public transport is inadequate</li> <li>• We have no idea how the public transport will change post pandemic</li> <li>• Removal of off-street parking is undesirable and dangerous.</li> <li>• Additional parking pressure on residential roads leading off The Burroughs would negatively impact those residents.</li> <li>• 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.</li> <li>• New homes on the car parks will block out light and cause safety and security issues for local residents.</li> <li>• New homes which will put a strain on infrastructure.</li> <li>• Housing on Burroughs Gardens car park would negatively affect local businesses situated to the rear and side of the car park.</li> <li>• There is no data on the effects of the pandemic and Brexit on population flow.</li> <li>• More than 17 privately owned buildings will be compulsorily purchased, and tenants forcibly moved out their homes.</li> <li>• There is ample opportunity for Middlesex University to develop its campus within its own footprint.</li> </ul> <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. 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>
REP763	ID133	TFL (Spatial Planning)	Site 4 Site 5 Site 6 Site 15 Site 22, Site 23 Site 24 Site 27 Site 30 Site 32 Site 33 Site 34 Site 35 Site 39 Site 47 Site 53 Site 55 Site 58 Site 61 Site 62 Site 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>
REP764	ID102	NorthWestTwo Residents Association	Site 7 Site 8	<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</p>

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				<p>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. Crickelwood 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 (“gargantuan”, “vast disparity and inappropriateness of scale, height and massing”, impact on conservation are, 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>
REP765	ID094	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>
REP766	ID101	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>

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				<p data-bbox="786 156 1144 180"><i>Figure 3: Oakleigh Health Centre</i></p>  <p data-bbox="770 743 2089 959">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. 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 +).</p>
REP767	ID070	Hurricane Trading Estate	New Site	<p data-bbox="770 968 2089 1398">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</p>

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				<p>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.</p>
REP768	ID027	CasaBella Developments	New Site	<p>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 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</p>

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				intensification should be provided in the Local Plan. Policy H1 of the 2021 London Plan encourages such allocations in preparing delivery-focused Development Plans.
REP769	ID024	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,</p> <p>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>



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REP770	ID065	Hertfordshire County Council	New Site	<p>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 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>
REP771	ID132	TFL (Commercial Development)	New Sites	<p><b>Colindale Station</b> 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. <b>Land at Golders Green Station</b> 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</p>

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				<p>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.”</p> <p>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. <b>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.</b></p>
REP772	ID038	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 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>

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REP773	ID024	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 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.</p>
REP774	ID129	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 policies 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</p>

Reference	Representor Reference	Representor	Section	Summary of Comments
				<p>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 policies. 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 be 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, expects 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>
REP775	ID143	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 its 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 &amp; 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 &amp; 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: <i>455. 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. 456. 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</i></p>

Reference	Representor Reference	Representor	Section	Summary of Comments
				<p><i>order to close the gap 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.</i> 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 if the NPPF. Provided as <b>Document 2</b> 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>
REP776	ID091	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"> <li>- 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.</li> <li>- 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.</li> <li>- 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.</li> <li>- 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.</li> <li>- 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.</li> </ul>

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REP777	ID023	Brent Cross South Limited Partnership ('BXS LP'),	Evidence Base - Car Parking Study	"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.
REP778	ID023	Brent Cross South Limited Partnership ('BXS LP'),	Evidence Base - Car Parking Study	"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 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.
REP779	ID023	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.
REP780	ID023	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.
REP781	ID023	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.
REP782	ID023	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.
REP783	ID023	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.
REP784	ID023	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.
REP785	ID023	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.

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REP786	ID092	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.
REP787	ID091	Mays Lane Gospel Hall Trust	Evidence Base Green Belt Review	<p>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.</p> <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 accommodation 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'.</p> <p>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>
REP788	ID038	Diocese of London	Evidence Base Green Belt Review	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

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				<p>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="0"> <thead> <tr> <th>Purpose</th> <th>LUC's Assessment</th> <th>Our Assessment</th> </tr> </thead> <tbody> <tr> <td>Purpose 1 Assessment – to check the unrestricted sprawl of large built up areas</td> <td>Strong</td> <td>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>Purpose 2 – To prevent neighbouring towns from merging into one another</td> <td>Relatively weak</td> <td>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>Purpose 3 - To assist in safeguarding the countryside from encroachment</td> <td>Strong</td> <td>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>Purpose 4 – to preserve the setting and special character of historic towns</td> <td>Strong</td> <td>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> <tr> <td>Purpose 5 - to assist in urban regeneration by encouraging the recycling of derelict or other urban land</td> <td>Strong</td> <td>Development would not preclude the recycling of derelict and other urban land elsewhere in Barnet.</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.	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.
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REP789	ID011	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.																		
REP790	ID023	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.																		
REP791	ID119	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																		



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				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
REP792	ID060	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.
REP793	ID010	Barnet Green Spaces Network	New 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>
REP794	ID028	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 <sub>2</sub> 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 <sub>2</sub> increases. <b>Add new Strategic Policy GSS14</b> Development proposals should recycle and reuse existing buildings instead of building new to address increasing CO <sub>2</sub> emissions which cause climate change.
REP795	ID014	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.
REP796	ID014	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.
REP797	ID014	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.
REP798	ID014	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.
REP799	ID014	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

Reference	Representor Reference	Representor	Section	Summary of Comments
				New Southgate where there is a growth area and a number of site-specific proposals. <a href="https://www.buglife.org.uk/our-work/b-lines/">https://www.buglife.org.uk/our-work/b-lines/</a> We propose that B-lines should be added to the Key diagram, proposals map, appropriate policies and site-specific proposals.
REP800	ID014	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.
REP801	ID014	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. <a href="https://frontgardens.nationalparkcity.org/">https://frontgardens.nationalparkcity.org/</a> We propose a new policy opposing use of front gardens for car parking.
REP802	ID010	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. <b>New Policy GSS14 Meanwhile Uses</b> 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 <b>supporting text</b> 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. <b>Glossary</b> 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.
REP803	ID010	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.
REP804	ID132	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.

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				<p>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, 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. <b>NPPF</b> 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>
REP805	ID023	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"> <li>• 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).</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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).</li> </ul> <p>We have highlighted in the table below the specific instances where the terminology might be changed to provide clarity.</p>

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REP806	ID141	Peter and Nargis Walker	General	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.
REP807	ID141	Peter and Nargis Walker	General	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.
REP808	ID141	Peter and Nargis Walker	General	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 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, <a href="https://www.theguardian.com/business/2021/jul/05/housebuilder-taylor-wimpey-opposedplans-cut-new-home-emissions">https://www.theguardian.com/business/2021/jul/05/housebuilder-taylor-wimpey-opposedplans-cut-new-home-emissions</a> is highly questionable. In what way would this be high quality, sustainable, or environmentally friendly? 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 <a href="https://www.bbc.co.uk/news/uk-scotland-north-east-orkney-shetland-57942459">https://www.bbc.co.uk/news/uk-scotland-north-east-orkney-shetland-57942459</a> Does Barnet really need a potential Grenfell?
REP809	ID113	Queen Elizabeth's School	General	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.
REP810	ID024	Bridge Industrial and Extra MSA London Gateway Ltd	General	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. 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

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				<p>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>
REP811	ID103	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. <b>Total 2256 dwellings</b> National Institute for Medical Research. Full planning permission approved in December 2017 for: "Redevelopment of the site to provide 460 new</p>

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				<p>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” <b>Total 665 dwellings</b> - 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” <b>Total 197 dwellings</b> 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 in adequate 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 <b>Appendix 1</b>. 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 <b>Appendix 2</b>. The Conservation Area Appraisal at <b>Appendix 3</b> 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 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.</p>
REP812	ID103	Oakfield House,	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</p>

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		Burtonhole Lane, Mill Hill		<p>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 than 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"> <li>- 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.</li> <li>- Reduce the Watertower House site down to the developable area only.</li> <li>- 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.</li> </ul>
REP813	ID068	Historic England	General	<p>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</p>

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				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 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.
REP814	ID014	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.
REP815	ID032	Comer Homes Group	Site 2	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.
REP816	ID084	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



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				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.
REP817	ID058	Hammerson UK Prop and Aberdeen Standard Investments	General	<p>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.</p> <p>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 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>
REP818	ID135	Ballymore Group and TfL Commercial Development	General	<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.</p> <p>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</p>

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				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.
REP819	ID041	DTZ Investors UK Ltd	General	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"). 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.
REP820	ID143	Whetstone Properties Ltd	General	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 <b>Document 1</b> . A brief summary of our previous representations are as follows: <ul style="list-style-type: none"> <li>▪ 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;</li> <li>▪ 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;</li> <li>▪ 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.</li> </ul> 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.
REP821	ID038	Diocese of London	General	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

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				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.
REP822	ID016	Barratt London	General	<p>Previous representations have provided information about Barratt London and their recent investment in Barnet. To summarise:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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:</li> <li>• To respond and recover from the impact of COVID 19</li> <li>• To deliver growth to meet housing aspirations and needs.</li> <li>• To improve the quality and types of housing across the Borough in response to resident needs and demographic change.</li> <li>• To make Barnet a place of economic growth and prosperity.</li> <li>• To improve connectivity and sustainable travel options.</li> <li>• To conserve and enhance the distinctive character and identity of Barnet's town centres and suburbs.</li> <li>• To support strong and cohesive communities and promote healthy living and wellbeing.</li> <li>• To deliver an environmentally sustainable Borough.</li> <li>• 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.</li> </ul> <p>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>
REP823	ID008	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 &amp; 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 <a href="http://www.barnetclimate.org.uk">www.barnetclimate.org.uk</a></p> <p>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 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</p>

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				infrastructure from the impacts of climate change. Barnet is clearly striving to ensure that its 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.
REP824	ID129	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: <a href="https://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/">https://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/</a> 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>
REP825	ID023	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>


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REP826	ID092	Mays Lane Gospel Hall Trust	General	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 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.
REP827	ID011	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.
REP828	ID130	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.
REP829	ID010	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 <sup>nd</sup> 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.

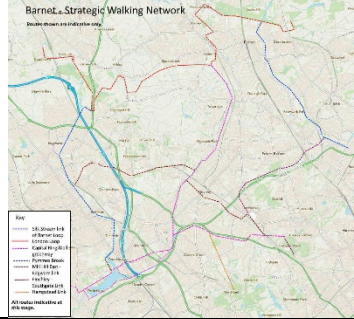
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REP830	ID010	Barnet Green Spaces Network	General	<p>We would strongly encourage the Local Plan to be more ambitious. It is good to see environmental elements in lots of the plan but they are safe and low to mid level. The plan appears quite old fashioned 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!</p> <p>The borough needs to become a beacon / leading example of green action. Some top line suggestions:</p> <ul style="list-style-type: none"> <li>➤ 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</li> <li>➤ 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</li> </ul> <p>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.</p> <ul style="list-style-type: none"> <li>➤ Doubling Tree Canopy</li> <li>➤ Doubling Wildlife</li> <li>➤ Becoming litter free</li> <li>➤ Being Carbon neutral by 2030 – aiming for zero carbon homes</li> <li>➤ Sourcing all energy from renewables</li> <li>➤ Add to B lines / Increasing Wildlife Corridors – <i>esp in respect to new developments – ensuring that wildlife corridors are kept / increased in face of new development</i></li> <li>➤ <i>Wise to include a school target as many schools want to do more – so could be a good extra win</i></li> </ul>
REP831	ID133	TfL (Spatial Planning)	General	<p><i>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</i></p>

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				<p>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.</p> <p>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>
REP832	ID109	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>
REP833	ID065	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>
REP834	ID026	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 Simebrica, Assessing the wellbeing impacts of waterways usage in England and Wales ). We believe that by improving the quality of the visitor experience, alongside</p>

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				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.
REP835	ID083	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"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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</li> <li>• 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</li> </ul>



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				<p>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.</p> <ul style="list-style-type: none"> <li>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.</li> </ul> <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>
REP836	ID062	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. 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>
REP837	ID034	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</p>

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				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.
REP838	ID115	Roger Chapman Rambles Herts & North Middlesex	Barnet Strategic Walking Network	 The map shows a network of walking routes in Barnet, London. It includes a legend with categories such as '18. Strategic 10k', '19. Strategic 5k', '20. Strategic 2.5k', '21. Strategic 1k', '22. Strategic 500m', '23. Strategic 250m', '24. Strategic 100m', '25. Strategic 50m', '26. Strategic 25m', '27. Strategic 10m', '28. Strategic 5m', '29. Strategic 2.5m', '30. Strategic 1m', '31. Strategic 500m', '32. Strategic 250m', '33. Strategic 100m', '34. Strategic 50m', '35. Strategic 25m', '36. Strategic 10m', '37. Strategic 5m', '38. Strategic 2.5m', '39. Strategic 1m'. The map also shows the River Brent and various parks and green spaces.
REP839	ID098	Natural England	Brent Reservoir SSSI	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.
REP840	ID069	Home Builders Federation	Five Year Housing Land Supply and Housing Trajectory	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.
REP841	ID023	Brent Cross South Limited Partnership ('BXS LP'),	Freight and Servicing	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.

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REP842	ID011	Barnet Labour Group	Gambling	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.
REP843	ID041	DWD LLP	Garrick Industrial Centre LSIS Boundary	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 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.
REP844	ID098	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"> <li>• 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.</li> <li>• 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.</li> </ul>

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				<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul> <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>
REP845	ID111	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>
REP846	ID055	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 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>
REP847	ID143	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</p>

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				<p>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 29<sup>th</sup> 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>
REP848	ID038	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</p>

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				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.
REP849	ID098	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 (LNRSs) will be the key mechanism for planning and mapping local delivery of the NRN. LNRSs 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"> <li>• Map the most valuable existing habitat for nature</li> <li>• Map specific proposals for creating or improving habitat for nature and wider environment goals</li> <li>• Agree priorities for nature's recovery</li> </ul> <p>It is the government's intention that mandatory biodiversity net gain will provide a financial incentive for development to support the delivery of LNRSs through an uplift in the calculation of biodiversity units created at sites identified by the strategy. LNRSs 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 LNRS pilots; these pilots are testing various aspects of development of LNRSs, including their relationship to strategic planning, to inform secondary legislation and statutory guidance. According to the current timetable LNRSs should be rolled out in Spring 2022. Given that national guidance on LNRSs 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>
REP850	ID041	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 logically 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>
REP851	ID081	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>

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REP852	ID055	GLA – Planning	Opportunity Areas	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 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.
REP853	ID011	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.
REP854	ID109	Pinkham Way Alliance	Pinkham Way, LB Haringey	<p><b>4.1 Brief details of the Pinkham Way site.</b></p> <ul style="list-style-type: none"> <li>• Area c 6 ha. Provides home, breeding and foraging for endangered species. Rich in invertebrates.</li> <li>• Well over 100 plant species, including around 1500 trees (3.5ha). Included in National Forest Inventory.</li> <li>• Areas of priority habitat (open mosaic and lowland deciduous woodland).</li> <li>• Marked on Haringey's Green Grid map and on ALGG Finchley Ridge map as Green Space.</li> <li>• Stands foursquare within London Plan definition of Open Space. This status reinforced by London Plan definitions of Green Space and Green Cover.</li> <li>• 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.</li> <li>• 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>'.</li> <li>• Haringey's ecological consultant described the site in 2014 as '<i>... a rare resource for Haringey of high ecological value</i>'.</li> <li>• Meets the criteria for exclusion from the NPPF and LP definitions of brownfield land / PDL.</li> <li>• 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>'.</li> </ul> <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: <b>98, 99, 119, 120 (b), 153, 174, 175 &amp; 179</b>. The Council, as part owner, should also be aware of footnote 47 to NPPF 119, relating to making as much use as possible of</p>



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				<p>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><b>4.2 The Council's management of and attitudes towards the Pinkham Way site.</b> 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></p> <p>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 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.</p>
REP855	ID026	Canal & River Trust	Strategic Parks and Recreation	<p>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.</p>
REP856	ID109	Pinkham Way Alliance	Summary	<p><b>PWA</b> 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"> <li>• 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)</li> <li>• Failure to produce a Strategic Flood Risk Policy.</li> <li>• The SFRA excludes the flood impacts that developments in Barnet have on the Lower Lea river network and is therefore not fit for purpose.</li> <li>• Failure to apply the Sequential Test to sites allocated in the Plan and identified as being in flood risk areas.</li> <li>• 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.</li> <li>• Failure to assess potential "increase in flood risk elsewhere" from all sites allocated in the Plan.</li> <li>• 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.</li> </ul>



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				<ul style="list-style-type: none"> <li>Failure to assess how Green Spaces both within and contiguous to Barnet, including Pinkham Way, reduce the causes and impacts of flooding.</li> <li>Failure to examine how new development can contribute to reducing the causes and impacts of flooding both inside and outside Barnet.</li> <li>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.</li> </ul>
REP857	ID055	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.
REP858	ID008	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.
REP859	ID060	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.
REP860	ID097	National Highways (Highways England)	Policy CDH09 Advertisements	No reference is currently made to the SRN or Highways England within this Local Plan policy. The display of advertisements is subject to a separate consent process within the planning system. This is principally set out in the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. Most advertisements on land directly facing motorways and trunk roads require the express consent from the relevant local planning authority, as well as prior permission from the landowner before they may be displayed lawfully. It is a requirement of the local planning authority to consult Highways England on the road safety aspects of advertisements proposed alongside the SRN. Advertisements that are likely to distract motorists are unlikely to be approved. Highways England should be consulted on any advertisement proposals close to the SRN and Highways England will need to consider its location, if visible from the SRN, its size, brightness/lighting (if any) and its effect on public safety.
REP861	ID097	National Highways (Highways England)	Policy ECC02: Environmental Considerations	No reference is currently made to the SRN or Highways England within this Local Plan policy. For sites positioned site close to the SRN carriageway and junctions, it will be necessary to ensure that the proposals mitigate appropriately the potential for ground conditions, lighting, noise and vibration impacts. In terms of noise, we would expect the site masterplan to be designed to minimise the exposure of noise-sensitive receptors to strategic traffic, using either or a combination of a landscape buffer and acoustic bund designed to shield the settlement from motorway noise. In addition to noise impacts, we would also draw attention to the importance of ensuring that drainage, landscaping, lighting and

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				<p>boundary treatment proposals for the proposals in accordance with the DfT Circular 02/2013 Annex A A1, which states that all noise fences, screening and other structures must be erected on the developers land, and far enough within the developers land to enable maintenance to take place without encroachment onto highway land. We would expect that these issues are considered when finalising the site layout and masterplan proposals</p> <p>Impacts arising from any disruptions during construction, noise, vibration, traffic volume, composition or routing and transport infrastructure modification should be fully assessed and reported.</p>
REP862	ID097	National Highways (Highways England)	Policy TRC02 – Transport Infrastructure	<p>This Local Plan policy does make reference to Highway England in that it states that ‘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’</p> <p>England is interested in the potential traffic impacts of any development site proposals and/or policies coming forward, and the need to ensure that these are fully assessed during the plan-making stage. It is also imperative to identify any improvements needed to deliver aspirations at this early stage, as set out in Government policy. Paragraph 18 of the DfT Circular 02/2013 states that ‘capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage’.</p> <p>For individual Local Plan allocation sites, Highway England would expect necessary SRN improvements to have already been identified and tested as part of the long-term Transport Strategy. It should identify the provision of infrastructure at the right time to support the development strategy, combined with developer contributions to secure infrastructure provision as part of an Infrastructure Delivery Plan (IDP). As such, as site allocation later come forward as part of the planning application process, they will be expected to proceed in line with the necessary highway improvements identified as part of IDP strategy. This being the case, the only issues for consideration as part of a planning application submission, would be the phasing of the development in relation to the IDP strategy. Highways England would make use of Grampian conditions to ensure that necessary infrastructure is in place prior too or phased in relation to the development becoming operational. This will be necessary to ensure operation and safety of the SRN.</p>
REP863	ID097	National Highways (Highways England)	Strategic Transport Assessment	<p>We have examined the “London Borough of Barnet DLP Reg18 Strategic Transport Assessment Final Report June 2021”. In order to allow us to make a valid assessment of development impacts upon the M1, we seek further information and raise a number of queries below:</p> <p>Person trip generation for new housing developments is based upon 12 sites from previous planning applications within the Borough. The person trip rates are significantly lower in the morning peak hour (0.556) than equivalent TRICS estimates for London as a whole (0.704) based upon a mixed private/affordable category assumed equivalent to the proportions and types of developments in the Local Plan. Given that TRICS rates are based upon actual observations from a bigger sample size and most had travel plans for the developments surveyed, on what basis were the rates based in the transport assessments for planning applications based in Appendix C? Do the 12 sites comprising the previous planning applications (presumably without travel plans) better match the types of development in the Local Plan in relation to tenure and location for example? Please provide documentation of the research or links to the research evidence on the proportional vehicle trip reductions related to soft measures. In terms of soft measures to reduce highway vehicle trips, with what certainty will these measures be implemented throughout the Borough? Can it be demonstrated that the measures be similarly comprehensive to those in the studies used to derive the evidence of trip reductions? Additionally, can it be confirmed that none of these measures were applied to the trip rates from previous transport assessments used to derive trip rates for this study?</p> <p>It is unclear which soft measures are being implemented through the Local Plan and which measures are applied outside of the Plan? Have measures being applied outside of the Plan been included in both with and without development scenarios or just in the full Local Plan mitigation scenario (Scenario 3)? If measures are not Plan related, they should presumably also apply to Scenarios 1 and 2.</p>

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				<p>How have soft measure reductions been applied to matrices? How has distance been factored into reductions to reflect those sustainable measures are more likely to affect shorter distance trips, where wider travel choices exist enabling substitution by other modes?</p> <p>Table 8-22 shows flows through the merges and diverges at M1 Junctions 2 and 4. Please can you clarify whether the flows are in vehicles or PCUs?</p> <p>With suitable responses to these queries, we should then be in a position to assess the impacts at M1 Junctions 2 and 4 merges and diverges.</p> <p>We note also that the report does not include an assessment of impacts for the M1 southbound at Junction 1. Para 6.1 states that the LoHAM model “assumes the reconfiguration of the M1/A406 Junction from 2021 and that, for this reason, the V/C at this specific interchange cannot be considered representative of current conditions. For M1 Junction 1 southbound we need to understand the impacts of the Local Plan in terms of additional queues and delays compared to the scenario with only consented development within Barnet at the end of the Plan period.</p>

<sup>i</sup> <https://cyclingindustry.news/a-sale-every-3-minutes-electric-bikes-oussell-electric-cars-in-uk-during-2020/>

<sup>ii</sup> <https://ebiketips.road.cc/content/news/bosch-reckons-half-of-all-bikes-sold-in-2025-will-be-electric-3199>

<sup>iii</sup> A guide to Low Traffic Neighbourhoods <https://lcc.org.uk/pages/low-traffic-neighbourhoods>

<sup>iv</sup> <https://www.healthystreetscorecard.london/>

<sup>v</sup> Waltham Forest mini-Holland evidence: <https://wfcycling.wordpress.com/mini-holland/evidence/#LocalEconomy>

<sup>vi</sup> Cycling in London and Holland: <https://youtu.be/zq28fU2AuMU>

<sup>vii</sup> Enfield declares climate emergency: <https://new.enfield.gov.uk/news-and-events/council-declares-climate-emergency/>

<sup>viii</sup> 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>

<sup>ix</sup> Value of cycling report: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/509587/value-of-cycling.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/509587/value-of-cycling.pdf)