

# **Local Plan Regulation 18 Town and Country Planning (Local Planning) (England) Regulations**

## **Schedule of Representations and Responses**

**June 2021**

## Glossary of abbreviations

BXC	Brent Cross Cricklewood
BPOSS	Barnet Parks and Open Spaces Strategy
CCG	Clinical Commissioning Group
EQIA	Equalities Impact Assessment
FORAB	Federation of Resident Associations (Barnet)
GLA	Greater London Authority
HRA	Habitats Regulations Assessment
IDP	Infrastructure Delivery Plan
IIA	Integrated Impact Assessment
JSNA	Joint Strategic Needs Assessment
LB	London Borough
LPA	Local Planning Authority
LTTS	Long Term Transport Strategy
MHCLG	Ministry of Housing, Communities and Local Government
MHNF	Mill Hill Neighbourhood Forum
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
Reg 19	Regulation 19 of the 2012 Local Planning Regulations
The Regulations	The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)
SA	Sustainability Appraisal
SHMA	Strategic Housing Market Assessment
SoS	Secretary of State for Housing, Communities and Local Government
STA	Strategic Transport Assessment
WLO	West London Orbital

Representor	Section	Summary of Comments	Council's Response	Revised Plan?
CCI London Community Church	Chapter 1	Who decides what is in the best interest for the local area? – who writes the Development Plan? 1.2.2 – no allowances are made for places which are good for the community, meeting places. 1.3.1 – Development needs – refers to what? General development of infrastructures or housing? 1.4.3 – what is considered an adverse effect with regards to sustainability? 1.4.4 – For example: - if the 'community centre' / structure is already in place and integrated, what happens then?	The Council's Local Plan is the product of extensive engagement and evidence gathering process. Reference now made to policies to support social and community infrastructure. Development needs can refer to new homes, employment space, retail, transport infrastructure or open space. An adverse effect is any harmful impacts arising from policies. These are set out in the IIA document. The EQIA ensures that the policies in the Barnet Local Plan do not discriminate in any form (age, sex, race, disability, religion, sexual orientation, marriage/civil partnership, gender reassignment). All site proposals are consistent with the policies and all policies have been subject to the EQIA.	Yes
Brent Cross South Partnership (DP9)	Chapter 1	The general policy approach set out in this section is supported and we note that key evidence base documents are currently being progressed which will further influence the draft policies. We would welcome discussion on these documents in due course.	The Council welcomes this support.	No
Elizabeth Silver	Chapter 1	Para 1.2.1 Add this definition: Sustainable development is defined as development that meets the needs of the present without compromising the ability of future generations to meet their own needs. ( <i>Our Common Future, a report by the UN World Commission on Environment and Development, the Brundtland Commission, 1987</i> ) Paragraph 1.4.3 Add: "sustainable development ..... as defined in 1.2.1.	The Local Plan has been prepared within the context of the revised NPPF (2019) and its definition of sustainable development (paragraph 7 – 10).	No
Brent Cross South Partnership (DP9)	Para 1.1.3 Figure 1	This part of the Draft Local Plan describes the constituent parts of the Development Plan and other policy documents and guidance. We query whether the Brent Cross Cricklewood Development Framework SPG document is proposed to be updated or re-adopted as part of the Draft Local Plan.	There are no current plans to update the SPG	No
Geoffrey Silver	Para 1.1.6	This questionnaire is anonymous, but plan section 1.1.6 says that "respondents will be identifiable by name" - please clarify.	Questionnaire responses are anonymous while direct representations are identifiable	No
Home Builders Federation	Para 1.2.1	Paragraph 1.2.1 states that the Local Plan will operate over the period 2021-2036. It would be helpful to put this plan period on the front cover. However, we query why Barnet has chosen to adopt a different date series to the Draft London Plan. The Council should bring its Local Plan into conformity with the Draft London Plan and work on the basis of the time period 2019/20 to 2028/29. Despite the guidance in the NPPF, there is no point in planning beyond 2028/29 because the housing and employment land supply is uncertain beyond this date (see the Panel report on the Draft London Plan at paragraphs 150-152). As the Panel concluded, rolling-forward the existing target would not be effective. The London Plan will need to be updated by 2024 for adoption in 2025. Barnet should be prepared to update its Local Plan in line with the new London Plan so that it can slot into place as quickly as possible after this date.	We agree that 2021 – 2036 should be clearly stated on cover. This Plan needs to be in general conformity with the London Plan and the Mayor has not raised an issue about the timeframe of Barnet's Local Plan. As stipulated in the NPPF (para 33) there is a requirement for local plans to be reviewed to assess whether they need updating at least once every five years.	Yes
Ramblers Association	Para 1.2.2	Add policies to support health and wellbeing through active travel and links to countryside	This is reflected in supporting text for CHW02 and TRC01	No
Brent Cross South Partnership (DP9)	Para 1.3.2	This paragraph may benefit from an update to recognise that the Examination in Public of the draft London Plan has completed and the 'Intend to Publish' version has been issued and is likely to be adopted prior to the publication of the Reg. 19 version of the LBB Draft Local Plan.	Text has been revised to reflect the publication of the London Plan in March 2021.	Yes

Brent Cross South Partnership (DP9)	Para 1.4.1	We recognise that further documents as part of the Plan's evidence base are being prepared and will inform the Plan and its policies moving forward. Further detailed comments may arise on the relevant aspects of the Draft Local Plan once these documents have been made available.	Additions have been made to the evidence base and are published on our website	No
Former MHNF	Para 1.6.2	Section 1.6.2 should include mention of the fact that The MHNF has, on 6 March, made a new (revised) application to LBB Planners for Designation by the Council.	The MHNF application was withdrawn from the June 2020 Planning Committee by the applicant, as such there is currently no MHNF.	No
CCI London Community Church	Para 2.5.3	With the increase in both jobs, housing and population, what allowances have been made to support this? What strategies have been put into place to minimise any adverse effects which could lead to a lack of cohesion and safety within the community.	Ensuring community cohesion and safety is integral to the Local Plan. Policy CHW04 has been revised to better express what the Council will do to achieve this as Barnet grows and changes.	No
CCI London Community Church	Para 2.6.4	Consideration should also be placed on parking for the population and visitor increase.	Local Plan's restraint based approach to car parking is clearly set out in Transport and Communications	No
Brent Cross South Partnership (DP9)	Chapter 2	The Brent Cross Growth Area and delivery of the BXC planning permission will be a significant contributor to the Borough's growth objectives and will help establish a new character for a large area within the Barnet. BXC's contribution in this respect should be recognised here.	Text revised to highlight contribution of BXC	Yes
Elizabeth Silver	Para 2.1.1	Add: With more high-density living, fewer gardens and developments on green spaces, and also with more remote-working opportunities, young families are moving out of London. <a href="https://www.theguardian.com/uk-news/2019/jun/29/tired-of-london-thousands-flee-capital-for-a-quieter-life">https://www.theguardian.com/uk-news/2019/jun/29/tired-of-london-thousands-flee-capital-for-a-quieter-life</a> Therefore these population projections may become out of date. Supporting Comment: An increase in population from 392,000 to 452,000, or 15.3%, is incompatible with cuts in community infrastructure spending such as healthcare and libraries unless we are prepared to accept a lower standard of living..	The Council has based its strategy on the latest and most up-to-date population projections produced by the GLA. The Reg 19 Local Plan is supported by the Infrastructure Delivery Plan (IDP) which provides an assessment of current infrastructure provision, future needs, gaps and deficits, along with an indication of costs of providing infrastructure.	No
Elizabeth Silver	Para 2.6.1	Replace the word "congestion" (which applies to cars as well as buses) by "insufficient bus routes and frequency"	Congestion is the appropriate term. The Strategic Transport Assessment provides more detail about bus journeys	No
Barnet Cycling Campaign	Chapter 2	Studies shown that the main impediment to mass-cycling is the lack of safe infrastructure to keep cyclists safe from motor vehicles.	The Infrastructure Delivery Plan has been published as part of the Reg 19 Local Plan	No
Barnet Cycling Campaign	Chapter 2	Low Traffic Neighbourhoods (LTNs), School Streets, 20 mph limits, shared mobility and reducing traffic would all benefit cycling and improve physical and mental health. LTNs work and are popular with residents. School streets and 20 mph limits improve safety and encourage parents and children to use active transport to school. Barnet has no School Streets.	The Long Term Transport Strategy sets out proposals for increasing walking and cycling. The Local Plan has been updated to reflect the progress of the Transport Strategy	Yes
Barnet Cycling Campaign	Chapter 2	School Travel Plans need to consider suitable school uniforms. At schools where the uniform is much more suitable for cycling (polo shirt, sweatshirt, black trousers or shorts or a skirt) the level of cycle use is high as a result.	This is not a matter the Local Plan can address.	No
Barnet CCG	Para 2.5.1	Welcomes acknowledgement that health and wellbeing is strongly influenced by the environment in which people live and that planning policies and decisions can contribute to the prevention of ill-health and encourage healthy lifestyles. Health inequalities linked to deprivation should be recognised as a key challenge for the plan. In particular, the Council's programme of housing estate renewal has potential to positively address deprivation and inequalities.	Agreed that health inequalities linked to deprivation represents a key challenge for the plan and that housing estate renewal has potential to positively address deprivation and inequalities.	Yes
Brent Cross South Partnership	Section 2.1	We suggest that additional text is added to the description of Barnet's character to recognise that the character of the borough is set to further evolve, particularly in Growth Areas.	Agreed. The character of the Borough is evolving	Yes
Redrow Homes	Section 2.2	Should include reference to delivering at higher densities to achieve housing targets	Following the Mayor's London Plan, the Council is taking a design led approach to providing the most efficient use of land rather than setting density guidance.	No

Barnet Society	Section 2.2	Support the views submitted by the Federation of Residents' Associations of the London Borough of Barnet (FORAB).	The Council refers to its responses to representations raised by FORAB	No
Brent Cross South Partnership	Section 2.3	The Brent Cross Cricklewood regeneration will provide employment, retail, leisure and office space alongside other town centre uses: it is an emerging new town centre and destination which will contribute significantly to the Borough's economy and should be recognised within this section.	Agreed. Text revised	Yes
Environment Agency	Section 2.4	Our response to the Integrated Impact Assessment Scoping Report consultation (February 2019) identified some of the environmental characteristics within our remit. We would like to see the section on environment broadened to include the points above, so there is a more complete picture of Barnet's environmental challenges and opportunities. For species and habitats data and to see population trends we recommend using the Greenspace Information for Greater London website ( <a href="http://www.gigl.org.uk">www.gigl.org.uk</a> ). Barnet's environment features should be displayed on a map within the Local Plan, for example, flood risk and watercourses	Agreed This section has been revised	Yes
Ramblers Association	Section 2.5	Opportunities to improve Health and Wellbeing in 2.5 could include an additional paragraph on active travel and access to the countryside.	There are sufficient references within the Plan to accessing Barnet's greenspaces	No
Barnet Society	Sections 2.4 & 2.5	Agree with these sections but would like to see their interconnection acknowledged.	Para 5.1 makes this interconnection	No
Barnet Society	Para 2.1.2	Strongly support the Council's wish to use the Borough's open spaces to improve the health and wellbeing of its residents and attract visitors to the area. But to 'maximise' usage without proper care for its impact risks damaging our green and blue assets; the Council should 'optimise' usage (i.e. 'get the best out of', to quote the Vision, 3.1.1.).	Support welcomed – agree reference in last sentence ought more appropriately refer to "optimise the opportunity...."	Yes
Barnet Society	Para 2.1.4	Agree that sustainable growth is key, but it should be supported by commitment to the highest environmental standards reasonably attainable. By 2036, the end date of this Strategy, it will probably be too late to mitigate catastrophic climate change. That challenge must be at the forefront of the Council's planning now.	Agreed	Yes
Former MHNF	Para 2.2.1	The Council should encourage pro-active engagement with 'precision manufactured housing' in order to deliver affordable and high-quality family houses at an economic cost. These modular systems will become increasingly available as they are already in Europe (Germany and Scandinavia particularly). Use of these systems will greatly improve completion times since the components are manufactured in a factory, transported to a location and assembled, usually within a very short space of time, on site. The Council could encourage the use of this method by applying to it a simplified and speeded up Planning Consent programme, provided all appropriate planning guidance has been observed.	The Council supports innovation to deliver homes more quickly. The housebuilding industry, with the encouragement of Government, needs to meet this challenge	No
Former MHNF	Para 2.3.1	The MHNF wholeheartedly agrees with this section. The UK Retail market has indeed been 'experiencing significant structural and conceptual changes' due to competition coming from on-line retailers. On-line banking has, for many, reduced the need to visit town centres, thus further reducing footfall for retailers. There will shortly, for example, be no retail banking presence at all in Mill Hill's main street. The period for this draft plan will see even greater pressure upon the retail sector, and the Plan will have to make provision for a decreased retail presence on both Barnet and many other high streets throughout the UK. Vacant premises on the high street already bear witness to this fact. We recommend that the Council gives serious consideration to the possibility of offering Business Rates based not upon the value of the property, but upon the turnover of the business concerned. Local independent traders should also be given favourable treatment.	Support welcomed.	No
Barnet Society	Para 2.3.1 & 2	Welcome Council commitment to our town centres, and to sufficient provision of affordable and flexible workspace, particularly in town centres.	Support welcomed.	No
Spires Barnet (Williams and Gallagher)	Para 2.3.1 & 3.11	Support the recognition of changing structure and challenges faced by town centres and the need to be responsive and adaptable. Delivery of 6,100 homes in town centres and mixed use development in TCs also supported.	We welcome this support.	No

	GSS01 & 08			
Theresa Villiers	Para 2.3.1 & 4.19.5	Welcome intention of draft Plan to support local town centres, in particular the encouragement of flexible workspace. Supportive of greater residential provision if proportionate; however, not 'car-free' proposals as there should be provision of sufficient off-street parking spaces.	We welcome this support. Car-free development is only considered as having potential in areas with the highest public transport accessibility levels in Barnet. PTALs 5 and 6.	No
Former MHNF	Para 2.3.2	The Council should take steps to encourage a good mix of employment in the high street, not simply a series of low paid service jobs. Unfortunately, a large number of highly skilled jobs have moved out of Barnet in recent years. This will indeed require 'sufficient provision of affordable and flexible workspace'.	Improving access to new job opportunities is covered in the Economy Chapter	No
Former MHNF	Para 2.4.3	The drive toward zero carbon needs to be examined carefully. It has to be applied when consideration is being given to planning applications such as Partingdale Lane (19/6641FUL) where the National Grid proposes to use outdated technology in the erection of a 'Peak Power' Station. Extremely pollutive emissions will result. This can be avoided if such power stations adopt techniques that can substantially decarbonise operations. These methods are not even expensive. This type of plant should also be excluded from areas of Green Belt. For the first time judges, in the recent decision on Heathrow Airport expansion, have said that plans for a major infrastructure project are illegal because they breach the UK's commitments to reduce greenhouse gas emissions to tackle the climate crisis. This is a ground-breaking legal decision that could affect future infrastructure developments and puts the UK's commitment to cut emission to net zero by 2050 at the forefront of future policymaking.) There is a legal obligation to deliver net zero carbon by 2050 and meet the criteria of the Paris agreement. We see that Barnet have produced their draft integrated impact assessment for the Plan: <a href="https://www.barnet.gov.uk/sites/default/files/ia_report_part_1_0.pdf">https://www.barnet.gov.uk/sites/default/files/ia_report_part_1_0.pdf</a> There is however no mention of the Paris agreement in this document	Policy ECC01 has been revised to make more explicit reference to how measures taken through policies in the Local Plan will help to meet the target of net zero carbon dioxide. The Paris Climate Agreement has since been considered as part of the IIA policy review	Yes
Former MHNF	Para 2.5.1	'Health and wellbeing is strongly determined by the surrounding environment in which people live'. The Forum agrees. This factor should be at top of mind when giving consent to tall buildings of new flats immediately adjacent to motorways.	Support welcomed.	No
Barnet CCG	Para 2.5.2	Helpful if the plan referred to specific opportunities to align health and planning.	Agreed – Reg 19 highlights strong relationship between health and planning particularly with regard to COVID19.	Yes
Barnet CCG	Para 2.5.2	Refers to the Joint Strategic Needs Assessment - would be helpful if the plan identified the key health needs and priorities facing the borough as summarised from the health and wellbeing evidence in the Local Plan Key Facts Evidence Paper (January 2020).	In the interests of keeping length of the plan manageable and the contents not becoming dated, cross referring to JSNA is considered appropriate.	No
Former MHNF	Para 2.5.2	The Forum is disappointed to note the refusal in 2017 of proposals to improve traffic flow and safety at Mill Hill Circus roundabout (junction of A41 and Mill Hill Broadway).	The Plan makes no reference to this refusal.	No
Geoffrey Silver	Para 2.6.1	you need to add the following exceptions: <ul style="list-style-type: none"> <li>• Trains leaving Mill Hill East in the morning rush hour, e.g. 07:30 to 08:10, often have all seats taken throughout, and many more homes are still being built there, so Mill Hill East is now badly served, and more trains are urgently needed.</li> <li>• Watch Tower Site 49 has PTAL 1b, which is exceptionally low for development</li> </ul>	Mitigating problems with overcrowding is considered through the IDP, Long Term Transport Strategy and Strategic Transport Assessment. A key aim of the draft transport policies is to address and mitigate any potential issues that arise from proposed development.	No
Former MHNF	Para 2.6.1	The statement 'Barnet is well served by public transport for radial travel but orbital travel is significantly more challenging' is a gross understatement. For example, if a patient has been asked to attend at Barnet General Hospital and he/she lives in the centre of Mill Hill, the distance to travel is 4.7 miles. By car this will take 13 minutes. By bus it will take one and a half hours involving a change of bus and a walk over terrain that is not suited to a patient who is likely to be feeling unwell. Similarly, the distance from Mill Hill to say Ealing in west London, is 9 miles. This takes 31 minutes by car but 77 minutes by bus. Thus, orbital travel around northern perimeter of London is poor, and it has a serious impact on	The Council has updated the Local Plan following production of the Long-Term Transport Strategy and the Strategic Transport Assessment.	Yes

		personal productivity. Many people are now time poor and cannot afford the time needed to go from A to B and back via the currently inadequate public transport system. Hence, they will continue to use their cars until a viable alternative is made available. We ask the question could an improvement be made by a beefed-up version of 'Dial A Bus'? We seek here suggestions as to improvements.		
Theresa Villiers	Para 2.6.3/4	Need for on-site car parking for new developments has not been recognised and will lead to more cars parked on already crowded streets. Although supportive of non-car based transport, the Plan needs to be realistic about modal shift.	Car-free development is only considered as having potential in areas with the highest public transport accessibility levels in Barnet. PTALs 5 and 6.	No
Barnet Society	Para 2.6.4	Agree with Council support for active travel and public transport opportunities, as well as promoting innovative ways to enable long term modal shift and would like overt commitment to cycling (human and electric-powered).	Agreed.	Yes
Redrow Homes	Para 2.6.4	Would be useful to identify the difference in car ownership between historic and recent developments (eg. Colindale Gardens provides 0.5 spaces per unit and not all spaces are taken up). Demand for car ownership in new-build appears to be lower than in existing development.	Barnet's Car Parking Study links property size and PTAL. Although the recommendation for PTAL 5 is up to 0.5, less than 2% of the Borough is within this PTAL and it will be a smaller portion that doesn't meet the CPZ and orbital PTAL of 4 or more so will be car-free in most cases.	No
Former MHNF	Para 2.6.4	The Forum doubts that in the next period of the Draft Plan 2020 to 2035, car ownership will fall substantially. There should however be a close examination of the effect of driverless cars that are likely to be available widely by 2030. This development might well help to reduce pressure on public transport. This will also affect the demand for car parking.	The technology for driverless cars is still emerging as is our understanding of their impact. More research is warranted. Therefore the next planning framework for Barnet should be the appropriate platform to address the spatial implications.	No
Environment Agency	Barnet's Vision & Objectives	Vision lacks ambition to support growth that benefits the natural environment and ensures resilience to climate change, for both people and wildlife. The Vision implies a continuation of the status quo for the environment rather than a firm ambition to improve it. For example, the vision could include aspirations to expand the green and blue infrastructure network in the Borough, reverse declines of biodiversity through net gain, restore rivers to more natural conditions making them more accessible and attractive for both people and wildlife, protect communities from flood risk now and into the future, seek measurable improvements in water quality, endorse tree planting and sustainable drainage measures across the Borough. We would like to see the Vision champion Barnet's environment and seek its betterment.	Agreed	Yes
Historic England	Chapter 3	We therefore advise that the Vision set out on page 20 makes specific reference to the Borough's heritage and the need to conserve, and where appropriate, enhance the historic environment	Agreed	Yes
Historic England	Chapter 3	We would expect to see the conservation and enhancement of the historic environment be referred as a key objective on page 21.	Agreed	Yes
Barnet Cycling Campaign	Chapter 3	The vision statements need an additional paragraph referring to the benefits to health, wellbeing, local environments and climate change arising from the provision for active travel, which will be integral to sustainable development. Concentrating the expected growth in Barnet's population on key transport corridors and sustainable locations provides an essential and unmissable opportunity to provide for active travel, improving the character of Barnet's town centres and the health and well-being of the population.	Agreed.	Yes
Finchley Society	Chapter 3	Chapter should reference Barnet as a constituent borough of Greater London with close links to Hertsmere in Hertfordshire.	Agreed. Reference made in Chapter 1.	Yes
Brent Cross South Partnership	Chapter 3	Throughout the plan references to "Brent Cross" and the "Brent Cross Growth Area" should be clarified to ensure that the terminology is precise and the differences between the various references made explicit. The optimisation of sites should be promoted in line with the draft London Plan.	Local Plan has been revised to ensure consistent terminology and general conformity with the London Plan.	Yes
Geoffrey Silver	Chapter 3	Vision section 3.1.1 says that "growth has been directed into the most sustainable locations with good public transport. These include ... Mill Hill East". The Mill Hill East development area is the only one so	Mill Hill East, in particular Millbrook Park is an example of good suburban growth. The Infrastructure	No

		close to precious Green Belt, and developments there are much denser than the characteristic density in Mill Hill. This has already resulted in high pressure on infrastructure, e.g. Mill Hill East trains and GP surgeries. In particular, the massive leap in density that has been allowed opposite Mill Hill East station is shockingly out of keeping.	Delivery Plan provides an assessment of current infrastructure provision, future needs, gaps and deficits, along with an indication of costs of providing infrastructure. This will be a live document that is continually updated with internal and external partners.	
CCI London Community Church	Chapter 3	Q4 - 3.2.2 – How do you plan on supporting 'strong and cohesive communities'? Social infrastructure refers to what exactly? Although it is understood that additional housing needs to be built, the main focus appears to be just on housing, what about the current residents and what can be done for them whilst also adding to the sense on community? Q5 –the focus seems to be mainly on housing issues. Were the importance is evident, current residents do not appear to be taken into consideration. Furthermore, allowances for parking and increased car use do not seem to be considered. Although car use has lowered, with additional residents and population grow, this too will increase.	Social infrastructure includes schools, GP surgeries, community venues, green spaces and places of worship, is an essential resource but is also part of our sense of place and a part of our identity. It builds strong and cohesive communities. The Local Plan is focused on managing growth retaining the qualities that attract existing residents to live and stay in the Borough. The Local Plan follows a restraint based approach to car parking and encourages residents and visitors to use more sustainable forms of transport as an alternative to the car.	No
Elizabeth Silver	Chapter 3	The Vision and Objectives sound good on paper but they are not going to be delivered by the proposed plan. Too high a population density will work against many of the points in 3.2.2. Many young families are moving out of London due to high house prices and dense living conditions.	The Council considers that it has got the balance right in planning for growth and delivering the way forward to meet Barnet's challenges.	No
LB Haringey	Chapter 3	While supportive concerned as to how they have been translated into proposed Growth Strategy	The Growth Strategy Delivery Plan sets out the key projects where the Council will direct its future investment .This will be reflected in our Statement of Common Ground	No
Sport England	Chapter 3	Welcomes the Borough's vision to include active travel and promotion of health living.	We welcome the support.	No
Ramblers Association	Vision	Extend to include 'Getting the best out of our green and open spaces Barnet continues to be a place where people choose to make their home. Good access to these spaces contributes to the health and wellbeing of residents'	Ensuring such access is reflected throughout the Local Plan	No
Former MHNF	Vision	Para 3, last line... (of the vision) 'Outside these locations, growth has been supported in places with capacity for change and where local character and distinctiveness are recognised.' We suggest that a change is made as follows: 'recognised and preserved' – which links to the defining character areas in Mill Hill. With reference to the phrase "Getting the best out of our green and open spaces" Barnet continues to be a place where people choose to make their home. We suggest this is a bit ambiguous – What is 'the best'? Use for housing? How about 'Safeguarding our Green and Open spaces'?	The Plan's objectives highlight that rather than preserve character we seek to enhance. They also clarify that we want to improve access and enhance the contribution of green spaces.	No
Former MHNF	Vision	Para 6. 'Improved orbital activity'. Improvement here is a paramount requirement in the Plan for the next period 2020-2035	The Reg 19 has been updated to reflect the Long Term Transport Strategy and the Strategic Transport Assessment	No
Former MHNF	Vision	We question the statement in Para 5 'Barnet's town centres thrive'. With pressure on retail businesses, referred to earlier, employment will be reduced together with footfall. The Council should consider carefully how it can improve 'Polycentric Development'. We mean by this, that greater attention and encouragement should be given to outer London town and district centres. In reality, Central London, Brent Cross and say, Borehamwood often take pride of place, to the detriment of Mill Hill and other similar centres. As stated in the NLA's Guide 'London's towns have to be little pieces of city in their own right rather than dormitory suburbs, but also highly integrated with surrounding areas.' We recommend that Barnet Council incorporates many of the recommendations from this guide in its strategic design for	The Reg 19 reflects the Council's response to COVID19 and structural changes regarding composition and mix of uses and the support that will be necessary for ensuring the delivery of thriving town centres and local economy over the lifetime of the Local Plan.	Yes



		the future of the Borough. Significant action needs to be taken now by the Borough of Barnet to redress this imbalance. This Local Plan does not give us the impression that Barnet Council understands the severity of the many issues which face a growing borough		
Former MHNF	Vision	Para 7. A 'thriving jobs market'? This is simply not the case. We have dealt with this aspect earlier. The Council must give attention to improving the diversity in the high street, and accept that if retail is failing, it must be replaced by change that meets today's and future needs. Developments have been approved recently that certainly do not lead to a 'healthy and safe borough'.	The Reg 19 reflects the Council's response to COVID19 and structural changes regarding composition and mix of uses and the support that will be necessary for ensuring the for delivery of thriving town centres and the local economy over the lifetime of the Local Plan.	No
Former MHNF	Para 3.2.1	We do not see a 'connected borough'. In Mill Hill for example, consideration must be given via transport policy to connecting the area orbitally. Mill Hill East must in future connect easily with Mill Hill Broadway and Mill Hill mainline station. We also do not see a 'thriving town centre' here.	The Reg 19 has been updated to reflect the Long Term Transport Strategy and the Strategic Transport Assessment	No
Ramblers Association	Para 3.2.2	Suggest add ..'through a strategic walking network'	Walking is already clearly promoted through this objective	No
Barnet CCG	Para 3.2.2	Supports the objectives including those promoting healthy living and wellbeing and to meet social infrastructure needs. The objectives underpin the 51 plan policies and it would helpful if the links between the objectives and policies were clearly identified, particularly in relation to the healthy living and wellbeing objective.	Support for objectives welcomed. Table 2 has been revised accordingly.	Yes
Finchley Society	Para 3.3.1	The figure of 46,000 is fundamental and its implications for the whole borough over the plan period are unattractive. Draft plan is not as clear as it should be about the basis for this figure.	The housing target is now the London Plan target of 35,460	Yes
Former MHNF	Para 3.3.1	We simply do not understand the numbers given in this paragraph. We see here a requirement for 'a minimum of 46,000 new homes. Yet the population growth is stated elsewhere to grow from 392,000 to 452,000 at the end of the plan period, a growth of 60,000. Taking an average occupancy of 2.5 persons per home, we cannot reconcile these numbers. See also our comments at Section 5 below. We see that the SHMA dated 2018 indicates that average occupancy may reduce to 2.25 by 2041 (p25-26). Clearly this is not exact science. 452, 000 residents at 2.25av occupancy would indicate a need for 200,888 homes in total, and 46,000 new homes represents a 23% increase in homes, while population expectations suggest only a 15% increase. We suggest that the average occupancy has been reduced by virtue of developers building far too many 1- & 2-bedroom flats when 3-4-bedroom family houses are actually required. Further, there is an increase in intergenerational living which serves to increase the average occupancy, and many new residents in Barnet will tend to have larger families. Many young families are moving out of London as housing built in the last 10-15 years is not to their liking, being too small, too dense and lacking a garden. Accordingly, they will accept a longer commute. This also demonstrates that far too many expensive flats have been built rather than family houses.	The housing target is now the London Plan target of 35,460. Reference has been made to multi-generational homes and a definition added to the Glossary	Yes
Environment Agency	Para 3.3.2	There are positives within the objectives (3.3.2) such as 'to deliver an environmentally sustainable Borough' and 'enhance the contribution of the Green Belt, Metropolitan Open Land and other green spaces and infrastructure.' However, given the environmental opportunities, the environment should feature more strongly. The objectives concerning the environment are towards the bottom of the list which implies (however unintentionally) that Barnet's environment is lower down the list of priorities for the Borough. We'd like to see more ambition for the environment in the objectives. We would like to see an objective that recognises the value of water as a precious resource to homes and businesses whilst supporting wildlife habitats. There should also be an objective that seeks opportunities to integrate the natural environment into the urban landscape via green spaces, pocket parks, tree planting, sustainable drainage measures, so that there is habitat connectivity, water attenuation and resilience to climate change.	Agreed.	Yes
Former MHNF	Para 3.3.2	In order to decide, or indeed pass a view, on the number of new homes needed for the Plan period we would need data on a range of issues including the current level of affordable property, occupancy	The housing target is now the London Plan target of 35,460	Yes

		levels, rented v purchased, vacancy levels and the intended level of replacement of dilapidated homes that would be demolished and rebuilt on an existing site.		
Brent Cross South Partnership (DP9)	Para 3.3.2	To reflect Chapter 5, this paragraph should include reference to support for a variety of residential types and tenures, including e.g. build to rent and student accommodation.	This is reflected in the reference to rental options	No
Theresa Villiers	Policy BSS01	Strongly urge the reduction of at least 20% the draft Plan target of 46,000 (to 33,460). Would like the Council to review projected population growth to ensure the information is up to date. Every effort should also be made to ensure homes are sold to local people and key workers rather than overseas investors.	The housing target is now the London Plan target of 35,460. Changes in population will be reflected in the next review of the London Plan. Controlling the purchase of private new homes by overseas visitors is a matter for the Government to address.	Yes
LB Brent	Policy BSS01	Amendment to the punctuation would improve the clarity of this draft policy. c) In order to better manage the impacts of development on the climate, growth will be concentrated in accordance with the Local Plan's suite of strategic policies GSS01 to GSS13 in the most sustainable locations with good public transport connections.	Agreed This will be reflected in our Statement of Common Ground	Yes
Historic England	Policy BSS01	the plan would be improved by making specific reference to heritage at the strategic level. Part c) of the policy could be amended to in this respects, alternative wording could be: <i>where there is recognised capacity, and where the historic environment and local character can be conserved or enhanced as a result.</i>	Agreed	Yes
Barnet Cycling Campaign	Policy BSS01	Part c) of this policy should include references to active travel (cycling and walking) rather than just public transport as follows: "c) In order to better manage the impacts of development on the climate and traffic congestion, growth will be concentrated in accordance with the Local Plan's suite of strategic policies GSS01 to GSS13 in the most sustainable locations with good public transport connections and active travel provision. Outside of these locations, growth will be supported in places where there is recognised capacity and local character can be conserved or enhanced as a result."	Agreed.	Yes
Mayor of London	Policy BSS01	The Mayor welcomes the spatial strategy which sets out where Barnet will deliver its new housing and wider economic and social needs. In this regard, draft Local Plan Policy BSS01 should reference Barnet's opportunity areas as set out in Intend to Publish London Plan Policy SD1, as well as its growth areas, and not simply note these as being town centres and transport nodes. The Intend to Publish London Plan identifies three Opportunity Areas in Barnet. These are Brent Cross/Cricklewood (part) with an indicative housing capacity of 9,500 homes and 26,000 jobs; Colindale/Burnt Oak with an indicative housing capacity of 7,000 homes and 2,000 jobs; and New Southgate (part) with an indicative housing capacity of 2,500 and 3,000 jobs. Opportunity Areas are likely to receive significant amounts of investment, with partners focusing and coordinating delivery in these areas. Greater reference to the Opportunity Areas would also better reflect the areas identified in the associated Key Diagram, which includes Opportunity Areas. Greater emphasis should be placed on the potential role of Barnet's Opportunity Areas to meet its housing and wider needs given the wider investment likely in these areas. It would also be useful to have a map that sets out the Site Allocations within the growth areas to provide an indication how and where the growth will happen in each growth area. The Mayor welcomes the acknowledgement that growth must be planned to ensure suitable supporting infrastructure can be provided. In this regard, the Mayor welcomes Barnet's support for delivering improved transport capacity and infrastructure in the borough. To better support this, he urges Barnet to ensure that vital land necessary for the operations and enhancement of London Underground and rail services – particularly the Northern line – are sufficiently protected. Where there are opportunities to do so, development proposals should also contribute towards provision of step-free access and capacity enhancement at stations. The Mayor welcomes the joint working with Harrow to deliver development in the Edgware Growth Area.	Agreed. Policy BSS01 has been revised to identify the 3 Opportunity Areas in Barnet. Reg 19 better reflects the contributions of the Opportunity Areas as well as the Council's approach to the Growth Areas.  Responses on other policy issues are set out in more detail at relevant sections in this Report.	Yes

		<p>Draft Local Plan Policy GSS07 – Mill Hill East should make it explicit that Green Belt must not be developed, except on previously developed land.</p> <p>With regards to the West Brent Growth Area, it would be useful to show this area more clearly on a map, as it is not shown on Map 3 Brent Cross regeneration.</p> <p>Most of Barnet’s growth areas contain major road infrastructure and associated poor air quality. Barnet’s growth policies should be clear that schemes should address air quality concerns and should not worsen air quality, for example by creating canyon effects along major roads. Future Supplementary Planning Documents (SPDs) and Masterplans should direct sensitive uses away from areas of poor air quality and include guidance on how to minimise exposure to poor air quality.</p> <p>Barnet’s growth strategy broadly reflects Annex 1 Town Centre Network of the Intend to Publish London Plan. It sets out that Edgware (shared with Harrow) is a major town centre and Brent Street, Chipping Barnet, Church End, Finchley, East Finchley, Golders Green, Hendon Central, Mill Hill, New Barnet, North Finchley, Temple Fortune, Whetstone, Colindale/ The Hyde (shared with Brent), Cricklewood (shared with Brent/Camden), Burnt Oak (shared with Brent/Harrow) are all district centres.</p> <p>In addition, Brent Cross is noted as a potential metropolitan centre. For Brent Cross to be reclassified, a clear strategy should be developed and implemented (see Policy SD9 Town centres: Local partnerships and implementation) that secures a broader mix of store sizes and formats and a variety of town centre uses including retail, leisure, employment and social infrastructure, subject to demand, capacity and impact. The sizes and uses of premises should relate to the role of the future centre within the town centre hierarchy. In this regard, the Mayor welcomes draft Local Plan Policy GSS02 and the specific policy on creating a new Metropolitan Town Centre.</p> <p>Beyond the indicative job figures set out in Intend to Publish Policy SD1 for Barnet’s Opportunity Areas, Policy E1 directs offices to town centres and notes that there is limited demand for office development in outer London. Of Barnet’s district town centres only Temple Fortune and Cricklewood have been identified in Annex 1 of the Intend to Publish London Plan as having a medium potential for commercial growth including offices, with Barnet’s other town centres having low potential. Small offices in Chipping Barnet, Church End (Finchley Central), North Finchley and Whetstone should be protected as these centres show demand for existing office functions, generally within smaller units. Barnet’s site allocations that seek to protect office development should be focused in these areas.</p> <p>On a specific note draft Local Plan Policy GSS08 could be mis-read as the parking standards being minimums. The policy should be amended to make it clear that parking provision should be minimised, and not exceed the parking standards as set out in Tables 10.3 to 10.5 of the Intend to Publish London Plan. The Mayor welcomes the preparation of masterplans for the growth areas. These will create certainty to bring sites forward and speed up delivery.</p>		
Gwyneth Cowing Will Trust (Hill Group)	Policy BSS01	The adoption date of winter 2021 is challenging and the 15 year horizon should be extended to 2038.	Although date of adoption has slipped. The Council does not plan to change the Local Plan timetable and the Local Plan end date remains as 2036.	No
Lansdown	Policy BSS01	Policy BSS01 is generally strong in setting out the key targets for the Council, and the Spatial Strategy requires updating to reflect current needs. However, the decision to not meet the full OAN for housing Barnet may cause issues at Examination, and also requires strong justification. In this sense, Alternative Option relating to setting the housing target based on capacity including green field / Green Belt sites should be considered more, as sustainable sites on this type of land could make a meaningful contribution to the housing supply in Barnet.	Barnet’s Green Belt Study will help inform any future London wide review led by the Mayor. Any revisions to Green Belt / MOL made through the next review of the London Plan will be reflected in the Local Plan after this.	No
Harrison Varma Ltd (Savills)	Policy BSS01	The draft Local Plan seeks to deliver a minimum of 46,000 new homes (3,060 per annum) between 2021 and 2036. The Council has set this target following the preparation of a Strategic Housing Market Assessment. This target is well below housing need when calculated using the Government’s Standard Methodology (applying this methodology the Council is required to deliver 4,126 new homes per annum	The housing target is now the London Plan target of 35,460	No

		<p>or 62,000 new homes over the proposed life of the Local Plan). Taking account of this significant shortfall, it is important that residential intensification of sustainable locations should be supported within a positive planning framework. This should mean both the identification of additional sites that can be allocated for the delivery of residential units and ensuring that all policies can provide a positive context for the delivery of additional residential accommodation. Whilst it would be more appropriate to establish a housing target for the Local Plan that responds to the Government's Standard Methodology, if the Council justifies maintaining a lower minimum housing target then the policies of the Local Plan should be worded to support additional housing delivery to exceed the minimum target where proposals are demonstrated to be of high design quality. In this context, the clear statement within Policy BSS01 that the Local Plan will deliver a minimum of 46,000 homes between 2021 and 2036 is appropriate. All other related policies should be worded to ensure that a positive presumption exists for the delivery of additional residential units in excess of the minimum target, subject to assessment of any proposal in the context of other material planning considerations and responding to the direction of the Replacement London Plan's emphasis upon site capacity being based in design-led optimisation as opposed to a specific density in any individual location. This point is further emphasised by the Secretary of State's response to the Intention to Publish version of the London Plan which makes plain that London as a whole needs to deliver even more homes than noted by the London Plan. Given this, all housing targets must be considered as minimums and policies be worded to support delivery at higher levels where this is possible through appropriate design.</p>	<p>The Council considers that the policies of the Local Plan are sufficiently worded to ensure support for additional housing delivery where proposals are demonstrated to be of high design quality.</p> <p>Paragraph 0.0.21 of the London Plan 2021 sets out that boroughs do not need to revisit the housing targets set by the Mayor. In addition to this paragraph: <b>013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance</b> is clear that where a spatial development strategy (in this case the LP2021) has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to revisit their local housing need figure when preparing new strategic or non-strategic policies.</p>	
Brent Cross South Partnership (DP9)	Policy BSS01	<p>As noted above, reference to 'Brent Cross' should be clarified and should mean Brent Cross Cricklewood as a whole. The figures at part (a) ii. are not expressed consistently: the Zonal Floorspace Schedule within the Development Specification Framework of the BXC outline permission specifies c.395,000m2 of business use site wide and c.110,000m2 of retail uses site wide (but c.55,000m2 relates to floorspace North of the A406). This should be made clear or the figures used consistently. Part (a) ii. should also recognise the other land uses that will be brought forward within the Brent Cross Growth Area including new homes and employment floorspace together with a mix of other uses (including, education and leisure) in a new town centre with new and improved public spaces (including proposed improvements to Clitterhouse Playing Fields). Given the draft London Plan's aspirations for optimising land opportunities and increasing site capacity, we suggest that floorspace figures allow for optimisation where appropriate. As noted above, reference should be made to the new town centre both north and south of the A406 at Brent Cross.</p>	Agreed. Figures corrected	Yes
Environment Agency	Policy BSS01	<p>(NPPF para 20). NPPF para 149 states that plans should take a pro-active approach to mitigating and adapting to climate change taking into account the long-term implications of flood risk and water supply, etc. Also paragraphs 156 and 157 require strategic policies should be informed by a strategic flood risk assessment and inform a sequential risk-based approach to the location of development. Policy SI 5 Water Infrastructure of the London Plan (Intend to Publish version, December 2019) calls for working with Thames Water in relation to local waste water infrastructure requirements and the potential need for Integrated Water Management Strategies for growth locations in areas with insufficient water management capacity or flood risk. We need to see evidence of how the sequential test (and where applicable the exceptions test) has been applied to the spatial strategy and site allocations based on the strategic flood risk assessment mapping including climate change. We recommend the Sequential Test is undertaken in tandem with a Level 2 SFRA. We have reviewed the Site Selection Background Report December 2019. Although flood risk was one of the factors checked, the constraint resolution as part of the site assessment reveals flood risk was only referenced as a limiting factor, as there might be possible ways to mitigate risks or impacts. Whilst we agree flood risk does not necessarily rule out all sites, there are some sites where the severity of the flood risk and the hazard this represents should potentially rule out further consideration. In addition, the constraint resolution principle applied to the</p>	Key findings of the IDP are reflected in BSS01 and an additional/expanded policy included in the Environment and Climate Change Chapter. A Level 2 SFRA has been published alongside the Reg 19 which includes and been used to inform revised site proposals.	Yes

		<p>Site Selection process on flood risk doesn't fit with the aims of the flood risk Sequential Test for Local Plans (NPPF paras 157 and 158) We will also need to see evidence within the Integrated Impact Assessment, latest IDP and Local Plan (preferably supported by a background paper or Integrated Water Management Strategy) of how water supply and waste water capacity considerations have been taken into account in the planning for this level of growth (46,000 new homes plus office and retail space) and that the infrastructure will be in place to support this, at the right time, without detriment to the water environment. Currently these crucial elements are missing, and we would have to find the Local Plan unsound.</p>														
<p>Taylor Wimpey Strategic Land (Lichfields)</p>	<p>Policy BSS01</p>	<p>It is noted that the housing requirement for Barnet has been reduced in the Intend to Publish London Plan, as a result of the recommendations included in the Panel Report (2019). This is largely in response to the current land supply constraints London has in seeking to meet this need. The housing requirement now proposed is therefore much lower than the need identified through both the proposed OAN for the borough (as calculated in the GLA SHMA (2017)), and the standard method as now required under in paragraph 60 of the NPPF (2019). This is shown in more detail in the table below, and demonstrates the extent of the unmet need that will occur annually compared to the most up to date measure of need (latest standard method figure of 3,971 dpa). This illustrates how significant the housing shortfall will be if LBB does not seek to exceed the housing requirement.</p> <table border="1" data-bbox="392 603 1079 738"> <thead> <tr> <th></th> <th>New London Plan (Intend to Publish, Dec 2019)</th> <th>LBB Proposed Requirement in emerging Local Plan</th> <th>Originally identified need in the New London Plan (July 2017)</th> </tr> </thead> <tbody> <tr> <td>Annual Requirement (dpa)</td> <td>2,364</td> <td>3,060</td> <td>3,134</td> </tr> <tr> <td>Shortfall compared to standard method (dpa)</td> <td>-1,607</td> <td>-911</td> <td>-837</td> </tr> </tbody> </table> <p>In this context, there are a number of issues that LBB need to address in determining its housing requirement in the emerging Local Plan to ensure that sufficient homes are delivered in the borough during the Plan period to meet identified needs.</p> <p>In the first instance, the Secretary of State (SoS) published his letter in response to the New London Plan. Of most relevance here, he has exercised his powers under section 337 of the Greater London Authority Act 1999 to direct that the Plan as drafted cannot be published due to 'a number of inconsistencies with national policy and missed opportunities to increase housing delivery'. He has reiterated the need for an immediate review of the London Plan to ensure that London seeks to meet its housing needs without delay. Notwithstanding this, a key point is that the housing requirements set out in the New London Plan are minimum targets and that these only cover the period for 2019/20-2028/29. As the Barnet Draft Local Plan covers the period 2021-2036, the housing requirement should reflect this and identify a requirement which includes anticipated needs beyond 2028/29 as indicated above and in the light of the real likelihood that there will, by then, be a reviewed London Plan. LBB should therefore be looking to deliver more than its requirement in order to support the Government's objective to significantly boost the supply of housing (NPPF, paragraph 59), and not fall foul of the same issues currently facing the New London Plan. Linked to this, the Panel Report on the New London Plan raised serious concerns that the Green Belt boundaries were not being reviewed, whereby: "From the evidence we hear the inescapable conclusion is that if London's development needs are to be met in future then a review of the Green Belt should be undertaken to at least establish any potential for sustainable development. Therefore we recommend that this Plan include a commitment to a Green Belt review. This would be best done as part of the next London Plan." (Paragraph 457) The Panel Report goes on to suggest that a review of the London Plan could come forward in 2022 (paragraph 596), which is early on in LBB's emerging Local Plan period and further underlines that the Local Plan must have a long-term view in seeking to sustainably meet housing needs for 2021-2036. The SoS has</p>		New London Plan (Intend to Publish, Dec 2019)	LBB Proposed Requirement in emerging Local Plan	Originally identified need in the New London Plan (July 2017)	Annual Requirement (dpa)	2,364	3,060	3,134	Shortfall compared to standard method (dpa)	-1,607	-911	-837	<p>The housing target is now the London Plan target of 35,460 new homes</p> <p>The London Plan (published in March 2021) sets a target figure for Barnet of 23,640 net housing completions for the ten year period up until 2028/29. As stated in the Reg 19 draft plan, the Council considers this to be a minimum target</p> <p>Paragraph 0.0.21 of the London Plan 2021 sets out that boroughs do not need to revisit the housing targets set by the Mayor. In addition to this paragraph: <b>013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance</b> is clear that where a spatial development strategy (in this case the LP2021) has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to revisit their local housing need figure when preparing new strategic or non-strategic policies.</p> <p>As stated in para 4.1.11 of the London Plan, in terms of a target beyond 2028/29, boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward.</p> <p>Barnet's Local Plan will in any event need to be reviewed at least once every five years and so then be capable of responding to any future evidenced based changes (such as population projections and a strategic review of the Green Belt / MOL) reflected in a future London Plan.</p>	<p>No</p>
	New London Plan (Intend to Publish, Dec 2019)	LBB Proposed Requirement in emerging Local Plan	Originally identified need in the New London Plan (July 2017)													
Annual Requirement (dpa)	2,364	3,060	3,134													
Shortfall compared to standard method (dpa)	-1,607	-911	-837													

		also provided modifications to various policies including to the Green Belt and MOL policies to ensure they reflect the requirements of national policy. This therefore now allows LBB to release Green Belt and MOL land to meet housing requirements, and for MOL removes the requirement for no net loss. As such, LBB should seek to review their Green Belt and MOL land again and release any land not meeting the relevant GB/MOL requirements to ensure that housing can be delivered. As set out later on in this letter, land east of Colney Hatch Lane is one such site which could support LBB in meeting its housing requirement. On the basis of the above, LBB should be looking to identify a range of sustainable housing sites to accommodate well in excess of the minimum requirement identified in the current draft London Plan. This would ensure that it can meet housing needs for the future, in particular recognising the unconstrained need identified for the borough and the fact that there are sites which have not yet been identified for development that could come forward, such as the land east of Colney Hatch Lane.		
Whetstone Properties Ltd (Simply Planning)	Policy BSS01	It cannot be considered to form 'exceptional circumstances' and we consider the use of a housing figure of 46,000 is not in accordance with paragraph 60 of the NPPF and the plan cannot be considered sound with such a significant shortfall against the standard methodology.	The housing target is now the London Plan target of 35,460 . Paragraph 0.0.21 of the London Plan 2021 sets out that boroughs do not need to revisit the housing targets set by the Mayor. In addition to this paragraph: <b>013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance</b> is clear that where a spatial development strategy (in this case the LP2021) has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to revisit their local housing need figure when preparing new strategic or non-strategic policies.	No
New Barnet Community Association	Policy BSS01	Questions the assumptions and projections of the SHMA, contradictions with OAN. Eg. with population growth of 60,000 and 46,000 new homes this equates to 1.3 persons per property. At current home occupancy rate this would equate to population increase of 115,000 which would need infrastructure support and planning that hasn't been reflected.	The housing target is now the London Plan target of 35,460 MHCLG projections are the starting point for the SHMA. Figure 1 of the SHMA sets out the process for calculating a housing requirement.	No
Ropemaker Properties (Barton Willmore)	Policy BSS01	No reference to growth in industrial or warehousing uses.	Policy BSS01 focuses on the main components of growth. The London Industrial Land Demand Survey estimated a need of 7.3 ha of industrial land	No
London Diocesan Fund (Iceni Projects)	Policy BSS01	The policy states that between 2021 and 2036 the Plan seeks to deliver a minimum of 46,000 new homes. This is based on the Strategic Housing Market Assessment published in 2018. Councils are required to use the standard method to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply. This formula revealed that the Council's minimum housing requirement is 62,000 over the plan period. While it is acknowledged that the emerging London Plan has set a lower housing target for the Borough, there is a clear imperative to maximise the Council's housing target and explore the potential for meeting a higher housing target. Furthermore, the London Plan approach of opposing Green Belt release in Local Plans has not been deemed sound by the Examiners and thus cannot be used as a reason for Barnet to avoid reviewing the Green Belt. As set out the Consultation document, an alternative option for the spatial strategy was to set a housing target based on capacity using brownfield sites with development of green field / Green Belt sites. This would meet a greater proportion of the Borough's Objectively Assessed Housing Need, however the Council state that it would not meet the tests of the NPPF (para 137) necessary in order to demonstrate exceptional circumstances sufficient to justify Green Belt release and therefore a strong likelihood that the strategy would be found unsound. We do not consider this approach to be justified. Barnet is no different from any other local authority with significant levels of	Barnet is a London Borough and therefore the London Plan forms part of the development plan for Barnet. The housing target is now the London Plan target of 35,460  Paragraph 0.0.21 of the London Plan 2021 sets out that boroughs do not need to revisit the housing targets set by the Mayor. In addition to this paragraph: <b>013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance</b> is clear that where a spatial development strategy (in this case the LP2021) has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to revisit their local housing need figure when preparing new strategic or non-strategic policies.	No

		housing need who cannot meet it within the built-up settlement boundary. There is a clear and well-defined approach as defined by the Calverton High Court Judgement, this states that the following procedure should be followed: 1. The acuteness/intensity of the housing need should be assessed. 2. the constraints on the supply/availability of land suitable for development should be understood. 3. The difficulties in achieving sustainability without impinging on the Green Belt should be reviewed; 4. If the Council cannot accommodate growth outside of the Green Belt then potential for exporting that need to neighbouring authorities should be tested; 5. If none of the above steps can avoid delivering housing in the Green Belt then the nature and extent of the harm to this green belt should then be assessed against how far the impacts on green belt purposes could be reduced when delivering housing on Green Belt sites. These five clear steps have not been followed, the Council has stopped at Step 2, without properly understanding the potential of the Green Belt for delivering growth. We consider that due to the unlikelihood of adjoining authorities accepting growth from Barnet the Council should be assessing the potential of the Green Belt to accommodate growth in order to be considered sound.	As part of the supporting evidence used to inform the Local Plan the Council commissioned consultants LUC to undertake a review of Barnet's Green Belt and MOL.  Once adopted, Barnet's Local Plan will need to be reviewed at least once every five years and so then be capable of responding to any future evidenced based changes (such as population projections and any future strategic review of the Green Belt / MOL) reflected in a future London Plan.	
Finchley Society	Policy BSS01	The Alternative Options advert to several matters that should be explored a little in the actual text and would make other policies on the environment etc. easier to achieve. Phrases like 'is expected to accommodate' treat the borough as if it were totally passive; the Council could do something to reduce the growth and the text should explain why it does not attempt this. Barnet is not an island and is affected by the policies on housing and affordability pursued by neighbouring authorities, within and outside Greater London.	The housing target is now the London Plan target of 35,460	Yes
Barratt London (QUOD)	Policy BSS01	Support Barnet's approach to deliver between 2021 and 2036 a minimum of 46,000 new homes, which equates to a minimum of 3,066 homes per year (its Full Objectively Assessed Need for housing) - this is intentionally in excess of the Intend to Adopt London Plan requirement of 2,364 homes per annum, as it is not considered that 2,364 homes per annum would not fully meet Barnet's objectively assessed housing need.	The housing target is now the London Plan target of 35,460	No
LB Haringey	Policy BSS01	Questions why Barnet is not planning for the housing target specified in the Intend to Publish London Plan as a starting point – noting Haringey is not able to accommodate housing shortfall in other Boroughs.	Agreed. This will be reflected in our Statement of Common Ground	Yes
Federation of Residents Associations in Barnet (FORAB)	Policy BSS01	We are mindful that the 15 year target for the Borough is not necessarily settled and could be any one of 33,460, 46,000 or 62,000. We are however quite sure that the Inspectors recommendation that the target set in the Draft London plan should be reduced by 20% was soundly based. We are not proposing to examine here the viability of all the agreed and potential schemes identified by the council, but we are persuaded that 46,000 let alone 62,000 is unrealistically ambitious. In trying to assess what might reasonably be delivered we find the figures presented in the draft as unhelpful, indeed confusing. The only information on overall new homes delivery is the table 5 at 4.7.6. This serves to confuse rather than illuminate. The council does have specific data on schemes under construction, approved, or with planning applications submitted, which in total amount we understand amount to over 30,000 homes. This information should be presented in the document in tabular form as Appendix 1. Featuring 67 potential sites in the appendix is indeed misleading when many other more advanced and significant projects are not identified. Further, some of the 67 projects have approval or planning applications in and should be included in group above. We reckon maybe 9,000, not 16,000 homes should form an Appendix 2 of sites for which no proposals for development yet exist. We also consider that many of these sites are speculative to the extent that they are unlikely to proceed to redevelopment, and this is especially unhelpful as those locations will effectively now suffer planning blight with owners lacking any incentives to effect improvements. For potential sites the London Plan encourages Boroughs to set out acceptable height, scale, massing and indicative layouts. In the draft Local Plan we simply have indicative volume based on the density matrix. This is most unhelpful for communities who may rightly be concerned about what might happen on these sites. It is also an opportunity to get ahead of	The housing target is now the London Plan target of 35,460. Through the Local Plan we can demonstrate that this target is deliverable  In Annex 1 of his letter of March 13th 2020 to the Mayor of London the Secretary of State clearly states 'The housing targets set out for each London Borough are the basis for planning for housing in London. Therefore, boroughs do not need to revisit these figures as part of their local plan development, unless they have additional evidence that suggests they can achieve delivery of housing above these figures whilst remaining in line with the strategic policies established in this plan.'  Progress on delivery of this number, and the progress of site proposals, is fluid and is best captured in the AMR housing trajectory. Supporting text around Table 5 (and Table 5 itself) has been revised to provide greater clarification on delivery against numbers.	Yes

		developers who might otherwise come forward with unpalatable proposals. We recognise that undertaking a comprehensive assessment as suggested by the Mayor would be demanding, but we do consider that more effort should be made to assess the potential of any development other than just indicative numbers, some of which could turn out to be very misleading. The site descriptions at the end of the document could perhaps be expanded without too much difficulty to set down some principles for development.	Sites in the Schedule of Proposals are not speculative. They have gone through a robust site selection process. Individual site proposals have been revised to provide greater clarification on the parameters of proposed development including heights.  The Local Plan supports strongly a design led approach to growth	
West Finchley Residents Association	Policy BSS01	Refers to draft London Plan target to be reduced by 20% and the stated 62,000 homes is unrealistic and unnecessary. Support was noted for the IDP alongside future housing development.	The housing target is now the London Plan target of 35,460	Yes
Taylor Wimpey North Thames (Armstrong Rigg Planning)	Policy BSS01	Support	The Council welcomes this support	No
Mayor of London	Policy BSS01	Welcomes commitment above Intend to Publish Plan target for housing. Should include reference and greater emphasis on OAs. A map of site allocations within growth areas would also be useful	The housing target is now the London Plan target of 35,460 which through the application of this policy framework is deliverable. The Plan has been revised to place a greater emphasis on OAs and produce clearer boundaries for Growth Areas with Local Plan proposals sites clearly marked.	Yes
Elizabeth Silver	Policy BSS01	Building 46,000 homes for an increase of 60,000 in population means an average of 1.3 persons per household, ie people largely living alone. 55,000 m2 of new retail space in Brent Cross is unrealistic. It is well known that retail shopping centres are struggling due to internet shopping. Neither can they succeed as friendly "places" for meeting (unless they are in Victorian arcades) because they are on too large a scale with no architectural interest or green space. Alternative options: It should not be necessary to build in order to secure improvements in infrastructure. These should be planned ahead of housing. (The foundations of a house should be put in first, not <i>after</i> the house is built.)	The Plan acknowledges the impact that internet retailing has had on retail and provides flexible policies to enable town centres to respond. The system is based on contributions from implemented development funding the infrastructure rather than before it.	No
Home Builders Federation	Policy BSS01	While we acknowledge Barnet's positivity and ambition in planning for the longer term up to 2036 Part a) should be revised to bring the housing target in line with the time series in Table 4.1 of the Draft London Plan – namely for the plan to operate over the period 2019/20 to 2028/29.	The timeframe remains at 15 years. This is consistent with the NPPF	No
Barnet Society	Policy BSS01	Under: a) i - agree with FORAB that the target of 46,000 new homes is unrealistically ambitious. a) vi – Whilst having no objection in principle to a destination hub for sport and recreation at Barnet and King George V Playing Fields, strongly object to the Council's current proposal for a substantial development in the middle of the Green Belt.	We refer to the response to FORAB on BSS01  The Council considers that special circumstances support the proposal at King George V.	No
Redrow Homes (Avison Young)	Policy BSS01	Support	Welcome the support	No
Taylor Wimpey North Thames (Armstrong Rigg Planning)	Policy BSS01 & GSS01	In accordance with national planning policy, the Council's starting point for calculating its local housing need should be the standard method. The capacity to accommodate the level of identified need must be robustly assessed, including a Green Belt and MOL Review.	Paragraph 0.0.21 of the London Plan 2021 sets out that boroughs do not need to revisit the housing targets set by the Mayor. In addition to this paragraph: <b>013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance</b> is clear that where a spatial development strategy (in this case the LP2021) has been published, local planning authorities should use the local housing need figure in	No



			the spatial development strategy and should not seek to revisit their local housing need figure when preparing new strategic or non-strategic policies. . Barnet's Green Belt Study will help inform any future London wide review led by the Mayor. Any revisions to Green Belt / MOL made through the next review of the London Plan will be reflected in the Local Plan after this.	
Spires Barnet (Williams and Gallagher)	Policy BSS01 & GSS01	Is retail floorspace requirement deliverable – in reality more need for flexible space and repurpose existing retail. Evidence is outdated – 3 Experian briefing notes have since been published making adjustments to forecasts to reduce need. New retail should also include A3-A5 (as per TOW01)	The Plan reflects the changes to the Use Classes Order – A4 and A5 are now sui-generis and retail no longer exists as a specific planning use class.	No
Former MHNF	Policy BSS01(ii & iv)	We query the need for 55,000m2 of new retail space at Brent Cross and for 110,000m2 'across Barnet's town centres as set out in Policy TOW01'. This statement should come under close scrutiny. We have stated above that the retail market, in recent years, has been subject to sustained pressure from online competitors (Amazon etc). We believe that the Council is underestimating how difficult it is, at present, for all types of traders and restaurateurs. Profits at the best run and tested retail operators have been reducing in the current period by 25/45%. John Lewis, for example, is paying a 2% year- end bonus to staff. This is at the lowest level since 1953. We note your "floorspace needs assessment" in its comments on Mill Hill Broadway although the sands have shifted since your review. It is constrained by the building sizes of some sites and re-development is needed to secure its long-term future.	Brent Cross is a sub-regional destination attracting people for leisure and retail activities. The Plan reflects the extant consent for 55,000m2 at Brent Cross.  The Plan as part of COVID19 recovery wants town centres to be thriving and when confidence returns the Council hopes that there will be commercial investment in leisure within town centres.	No
Environment Agency	Policy BSS01c	Part (c) stipulates that in order to better manage the impacts of development on the climate, growth will be concentrated in accordance with strategic policies GSS01 to GSS13 in the most sustainable locations with good public transport connections. Outside of these locations, growth will be supported in places where there is recognised capacity, etc. We are concerned to what extent flood risk and water quality have been considered as strategic matters which have informed decisions around the spatial strategy. Infrastructure for waste water, water supply and flood risk are strategic matters to be considered as part of strategic policies	Agreed	Yes
TfL	Key Diagram	Crossrail 2 is not proposed to extend further north than New Southgate. The Council may wish to consider including the Strategic Cycle Network and potentially key bus corridors.	Agreed. Key Diagram has been revised to show Crossrail 2 stopping at New Southgate	Yes
Roger Chapman	Key diagram	Add Barnet Wastelands to the key diagram	An allocation for Barnet Wastelands in the Local Plan is not merited given the regulatory powers the Council can use to bring homes back into use.	No
Brent Cross South Partnership	Key Diagram	Clarity on the distinction between Opportunity Areas and Growth Areas is needed. The new town centre designation for Brent Cross should also be identified.	Key Diagram has been revised	Yes
LB Brent	Key Diagram	Brent Cross/Cricklewood is identified as an Opportunity Area in the London Plan. To make the area more manageable for planning in more detail it is understandable that LB Barnet has divided it into three parts. Historically these have been identified as Brent Cross London, Brent Cross South and Brent Cross Thameslink/Brent Cross West. Within the preferred options document the names of these respective areas needs consistency. In addition, the terminology around Opportunity Areas and Growth Areas needs further explanation/clarity earlier on in the document. For example, the key diagram identifies Brent Cross as an Opportunity Area, whilst Policy GSS01 identifies what is presumably this area as Brent Cross Growth Area. Brent Cross London's area is identified on Map 3, whilst elsewhere within the text, what is presumably the same area is identified as Brent Cross North. It is only when you get to policy CDH04 Tall Buildings (a considerable way into the document) that some clarity is provided on sites with both the opportunity and growth area designations noted for sites at Brent Cross/Cricklewood and Colindale. Provide consistency/ clarity across throughout the document with regards to the 'growth areas'/ 'opportunity areas' and the opportunity area boundaries.	Key Diagram has been revised and clarification on Growth Areas has been added including clear boundary maps. This will be reflected in our Statement of Common Ground	Yes

Historic England	Key Diagram	Map 2 – the key diagram shows the Borough’s identified growth areas. Mill Hill will be the area with the highest sensitivities and we advise that this is set out throughout the plan where the Mill Hill growth area is being discussed.	The sensitivities of Mill Hill East, in particular the Conservation Areas and the Green Belt, are reflected in Policy GSS07 and supporting text	Yes
TfL CD	Key Diagram	Housing growth should be focussed in all accessible locations, particularly those with good public transport connections. The Key Diagram should therefore also highlight areas around underground and other railway stations that are suitable for housing growth.	This approach to sustainable growth is reflected throughout the Local Plan – particularly in Policy GSS09. All stations are already identified on the Key Diagram	No
Brent Cross Dev Partners (QUOD)	Policies Map	There are a number of changes proposed to the Policies Map including proposed deletions and additions. One such deletion is the Cricklewood Regeneration Area, and it does not appear that there are any proposals to replace this allocation. The London Plan identifies BXC as an Opportunity Area and as such, the DPs would strongly request that this is reflected in any update of the Policies Map. In addition, the DPs would recommend that the Brent Cross Growth Areas are included within the Policies Map.	Boundaries of Growth Areas have been added to the Reg 19.	Yes
Mays Lane Gospel Hall Trust	Policies Map	To request that LB Barnet correct the boundaries of the Green Belt as has been done in some other minor instances in the Local Plan Review. This is to reflect the existing urban character of the eastern third of the site which comprises the existing circa 5,000 m3 building. As these representations will go on to consider, this part of the site does not perform well to any of the primary functions of the Green Belt which is generally agreed by the 2018 Green Belt Study and therefore we request that the boundaries are revised accordingly to address this, taking this part of the site out of the Green Belt	The site, 310 Mays Lane, was not highlighted as a potential minor Green Belt boundary adjustment in the study.	No
Former MHNF	Table 2	If the plan is not careful Barnet will lose ‘The qualities that attract people to live, work and visit the Borough’ As an example, there is a Planning Application’ now on hand that will sacrifice a considerable section of Green Belt (19/6641/FUL). Policies should be developed also that will encourage good design that is also suited to this area.	The Council considers that it has the policies in place to protect the Green Belt	No
Brent Cross South Partnership	Chapter 4	Opportunities for optimising land and increasing site capacity across the Brent Cross Growth Area should be supported where justifiable, in line with the draft London Plan. The potential interrelationship between Brent Cross West and the Brent Cross Growth Area should be recognised, along with the opportunities for connectivity between the two.	Agreed	Yes
Barnet Cycling Campaign	Chapter 4	Much of the proposed growth is in specific areas that will see higher density or along major thoroughfares - which is optimal for cycling. Provision of adequate local services, including nurseries, schools, healthcare, leisure and shops in line with changing demographics, are essential to minimise the need to travel long distances.	Agreed. The plan and supporting evidence (IDP) highlight the importance of providing supporting social infrastructure and services commensurate to the quantum of development.	No
Sport England	Chapter 4	Although most policies seek to improve/create walking and cycling, there is a lack of reference to the need for enhanced indoor and outdoor sports facilities to accommodate proposed growth. Links to Active Design (produced in conjunction with PHE) should be made in the Plan – going further than Policy CHW01 (eg CDH01).	Further detail on sport and leisure infrastructure is set out in the Infrastructure Delivery Plan; however, Policy CHW01 does give consideration to Active Design principles.	No
Chris Carabine	Chapter 4	Concerned that there is massive residential development in the borough and Mill Hill in particular, but no local growth in employment opportunity.	Local Plan seeks to deliver 27,000 new jobs under policy GSS01 and sets out employment policies such as policy ECY01 which seeks to protect and promote employment opportunities and policy ECY03 which seeks to increase residents access to local job opportunities.	No
CCI London Community Church	Chapter 4	New Southgate station expected to support development how? Through housing or additional commercial space etc.	New Southgate Opportunity Area is highlighted in the London Plan. The boundaries of the Opportunity Area have not been formally defined but they will cross into LB Enfield and LB Haringey. Although largely based on delivery of Crossrail 2, if this project does not happen there will be a greater focus on opportunities	No

			in the area around the North Circular. Boundaries are more likely to be around this road than extending along the East Coast Line. The Council will be working with the other boroughs and the GLA on creating an area planning framework which will be subject to public consultation.	
LB Enfield	Chapter 4	It is noted that a significant amount of new development, particularly housing will be focused in the growth areas and close to the Enfield borough boundary. Whilst we do not have an objection to this approach in principle, we seek reassurance that the cumulative impacts of development continue to be evaluated through the Integrated Impact Assessment and discussed between the agreed working groups to be established between our respective authorities and have been taken into account. This would also ensure opportunities for greater flexibility to plan, appraisal and prioritise schemes locally. We are willing to continue to constructively engage on this matter as part of the Duty to Cooperate arrangements for Barnet's Local Plan. A positive collaboration should in turn facilitate/unlock residential and mixed-use development opportunities offered by planned improvements on the Piccadilly line with Cockfosters, Arnos Grove Southgate and in the longer-term Crossrail 2.	This will be reflected in our Statement of Common Ground with LB Enfield	No
LB Enfield	Chapter 4	London-wide housing targets remain challenging for our respective boroughs. We note that Barnet's housing levels of need remains substantial albeit lower than the housing needs arising from applying the Government's 'standard methodology'. There is a role for greater sharing of knowledge and evidence based on between our respective authorities and the technical approaches applied in meeting the housing need across our functional housing market area. Additionally, we would welcome early dialogue on strategic development sites adjoining Enfield, in order collaborate on optimising such opportunities. In relation to affordable housing, we support the inclusion of build-to-rent within the draft plan recognising that Government has redefined affordable housing needs to include people who can afford to rent, but not to buy.	This will be reflected in our Statement of Common Ground with LB Enfield	No
LB Enfield	Chapter 4	Enfield supports Barnet's approach to meet need by focusing on the efficient use of land and increasing the intensity and use of land, in key town centres. This approach is considered likely to meet the quantum of new housing required. Enfield is supportive of Barnet's approach to meeting the OAN of its borough over the plan period. Enfield's emerging Local Plan also involves a town centres first approach; delivering higher densities within existing built-up areas; creating healthier and more inclusive streets; estate-led renewal and regeneration and an integrated approach to blue and green infrastructure. Enfield's emerging housing work is evidencing an uncapped need in the region of 3,750 dwellings per annum between 2018 to 2036. This represents a sizeable uplift in the scale of housing need compared to previous plan requirements and current and emerging London Plan need figure. The Council is seeking to accommodate its identified OAN within its own boundaries and as such set out that all available land will need to be considered to meet the significant housing and employment need challenge. Enfield is undertaking its own capacity study and a Green Belt assessment in line with National Planning Policy Framework and Planning Policy Guidance (PPG). At this stage, it is not possible to provide a definitive view on the capacity of the urban area but the implications of accommodating such a high level OAN figure within the borough will need to be informed through outputs of key supporting technical evidence base. Therefore, Enfield is willing to continue to constructively engage on this matter as part of the DtC arrangements for Barnet's Local Plan, as well as our wider neighbours to discuss how this issue can be resolved and to share technical approaches to evidence preparation.	This will be reflected in our Statement of Common Ground with LB Enfield	No
Client interested in North Finchley TC	Chapter 4	Our client has interests in a number of sites across North Finchley and in particular, the realisation of the aspirations within the North Finchley Town Centre Framework Supplementary Planning Document (February 2018) ("the SPD"). The Council will be aware that the Secretary of State has recently	The Council welcomes this support.	No

		concluded that the emerging London Plan does not plan for a sufficient level of housing and directs that the Mayor adopts a more ambitious approach to encourage and support the delivery of more homes across the capital. The outcome of this request will need to be reflected in consequential updates to the Council's housing policies if the Local Plan is to meet objectively assessed housing needs. Our client supports the Council's recognition of the changing trends within the retail sector and the need for town centre's to diversity and would request that this approach to diversification should be taken forward and reflected in development plan policies. Our client is supportive of the spatial approach to delivering mixed use developments within Barnet's town centres and specifically in respect of the inclusion of North Finchley within this policy. Our client supports the requirements of Policy GSS08 in respect of optimising residential density and providing zero parking provision where appropriate. This will assist ensure that Barnet's town centres have the best chance of being revitalised in line with the aspirations of the New London Plan. Policy GSS12 is concerned with car parks and identifies that the Council will support development of and above surface level public car parks for residential and other suitable uses subject to requirements. Our client supports this approach to the redevelopment of car parks and notes that this policy will allow the maximisation of brownfield land and help to promote a modal shift to more sustainable modes of transport.	Barnet's housing target is expressed as a minimum and is in accordance with the London Plan	
Former MHNF	Chapter 4	We agree with the Spatial Strategy, which must be adhered to, and contributions from developers must be realistic to bring forward the infrastructure changes that are vital if the growth is to be properly managed for the benefit of all. You cannot expect existing residents to be positive about a new residential development when as a consequence, getting a doctor's appointment becomes impossible and secondary school places are no longer available in quality schools based in NW7.	The Infrastructure Delivery Plan (IDP) provides an assessment of current infrastructure provision, future needs, gaps and deficits, along with an indication of costs of providing infrastructure. This is a live document that will be continuously updated. Planning Obligations in the form of CIL and S106 will be used to help deliver new social infrastructure in the Borough, including health facilities.	No
Environment Agency	Growth and Spatial Strategy	Both Colindale (opportunity area) and Edgware (growth area) include areas at risk of flooding from rivers. Mill Hill and New Southgate also appear to have some fluvial flood risk and are both opportunity/growth areas. Surface water flood risk is widespread across the Borough and there will be a presence of this type of flood risk in all growth/opportunity areas.	Agreed,	Yes
Friends of Finchley Way Open Space	Section 4.12	Support focus on Brent Cross as a destination shopping and leisure centre for local residents and those from further afield. The re-evaluation of the scale of the retail offering at Brent Cross and the inclusion of other types of facilities is welcomed. This would enable it to compete more effectively than at present with the Westfield sites in West and East London, however, better public transport links (especially Underground links) are essential to enable this. (mainly para 4.12.3)	Support welcomed.	No
Friends of Finchley Way Open Space	Section 4.13	Essential that developers contribute towards the cost of delivering infrastructure to support new housing, retail, industrial and office space. However, there is no mention of water and sewage supply or refuse removal from domestic and commercial sites, only of schools, primary care and various leisure facilities. (para 4.13.2)	Water and sewerage provision forms an important element of the Infrastructure Delivery Plan. The North London Waste Plan sets out policy on waste management facilities	No
John Cox	Section 4.14	Firstly, you say in the LDS: "There is an opportunity for an appropriate planning framework (Area Action Plan / Supplementary Planning Document) to be developed with LB Brent on Brent Cross West based on the delivery of West London Orbital Railway. This will unlock capacity for new homes and jobs as well as other benefits including improvements to the public realm." Have you made any decision on this "framework", please, or what will be considerations and likely time scales if you have not? Secondly, why does the Reg18 document say, in 11.3.38: "West London Orbital (WLO) is a new London Overground line (formerly known as the Dudding Hill Line)" Why "formerly"? That is news to us in Brent! Thirdly, as a representation to your Reg18 consultation, I would like to propose a new supporting document: "Brent Cross West Station Feasibility Study". It is referenced on your web page: <a href="https://www.barnet.gov.uk/regeneration/brent-cross-cricklewood/brent-cross-thameslink">https://www.barnet.gov.uk/regeneration/brent-cross-cricklewood/brent-cross-thameslink</a>	Initial discussions have started with LB Brent about potential for a joint planning framework. No milestones have yet been established.  Reference to Dudding Hill Line corrected.  Brent Cross West Station expected to be near completion by Local Plan adoption in 2022. Given this progress we do not see merits in adding the Feasibility Study to the Local Plan Evidence Base	Yes

		<p>Under "September 2019" there is the Brent Cross West Station Feasibility Study:  <a href="https://www.barnet.gov.uk/sites/default/files/wlo_brent_cross_west_interchange_feasibility_study_report_rev_p02.pdf">https://www.barnet.gov.uk/sites/default/files/wlo_brent_cross_west_interchange_feasibility_study_report_rev_p02.pdf</a>  This is clearly a strategic document, and material to Reg18, since under "November 2019" on that same referenced web page there is a validated planning (reserved matters) application 19/6256/RMA. The application is for a Brent Cross West station design that bizarrely does not have any reference to the feasibility study at all. That means the feasibility study must be a Reg18 strategic document, because it is not considered short-term! Supporting documents, of course, have to be relevant to a Local Plan, but they do not have to specifically affect wording. It can be assumed that all Reg18 supporting documents will be included with a Reg19 Local Plan and be accessible by an inspector. That is the justification and motivation for inclusion.</p>		
Brent Cross South Partnership	Section 4.14 and GSS03	Reference to the Brent Cross West Growth Area should recognise the adjacency/relationship with the Brent Cross Growth Area and Cricklewood Growth Area. The role of S106 and/or CIL for funding necessary transport and social infrastructure should also be promoted.	Agreed. Text revised.	Yes
LB Harrow	Section 4.16	Edgware Town Centre is bisected by the A5, although it is noted that the majority of the designated town centre lies within LB Barnet. Edgware Town Centre is classified within the draft New London Plan (2019) (Intend to Publish Version) as a Major Town Centre, with a high residential growth potential. The draft plan includes Policy GSS05 (Edgware Growth Area), which provides support to planning proposals that deliver growth and regeneration of the Town Centre, subject to delivering certain proposals. LB Harrow support the introduction of such a policy, recognising the growth opportunity for a highly sustainable location. As such, it agrees that the alternative option of not including an Edgware Growth Area policy would forgo this opportunity. Following on from the above, this policy is intended to be supported by a SPD. LB Barnet was successful in bidding for the Mayor of London's Homebuilding Capacity Fund, where it secured funding for the SPDs preparation for the Edgware Town Centre. By reason of the town centre overlapping administrative boundaries, LB Harrow are involved in the preparation of this SPD, and would be adopting it as part of its policy suite. LB Harrow look forward to continuing the dialogue and cross working with LB Barnet in relation to progressing this SPD, which will assist in guiding development of the Edgware Town Centre, and also across administrative boundaries.	Agreed. Text revised to acknowledge importance of town centre to LB Harrow residents. This will be reflected in our Statement of Common Ground	Yes
Friends of Finchley Way Open Space	Section 4.20	Existing public transport nodes I support the proposal that the requirement for car parking at TfL Underground stations should be reassessed and less land intensive options explored, rather than large scale reductions in parking. Not all residential areas in the borough are easily accessible by Underground and families may require more transport flexibility. (para 4.20.11)	Support welcomed.	No
Friends of Finchley Way Open Space	Section 4.20	It is very unlikely any part of Crossrail 2 will come into effect in the timescale of this plan and so including developments related to it seems somewhat irresponsible	The Plan has been revised to reflect lack of progress on Crossrail 2	Yes
Theresa Villiers	Section 4.24	Whilst supportive of Council's aim to provide better sports facilities it is important to balance the needs of sports users and other residents for general recreation.	We welcome this support. GSS13 and ECC04 seek to optimise the benefits of open space and a greener Barnet that will allow for recreational use by residents as well as active travel and healthy lifestyle.	No
Canal & River Trust	Section 4.24	Pleased to note that the Welsh Harp is identified as a visitor destination and will be subject to a further Visitor Destinations Study. The Trust is currently looking further at the potential to improve the reservoir as a destination and would be pleased to work with LB Barnet as part of this, have been looking at similar opportunities in collaboration with LB Brent and it would be useful to coordinate these. Would welcome further discussions about the designation of a conservation area across the Brent Reservoir (Welsh Harp) area. Formal designation would help develop and define a sense of place and enable more robust protection for the reservoir. Developments would be required to demonstrate that they respond positively to its significance.	Support welcomed.	No

Friends of Finchley Way Open Space	Section 4.24	Copthall playing fields and Sunny Hill Park. Support the development of this area as a major recreational centre. It must be acknowledged that outside London cars remain the main mode of transport. Copthall is easily accessible from the M1, A1 and the North Circular by road. However, this requires parking on site. As a national centre for sport, especially young people's swimming galas and other events, access is crucial to its success. Day-to-day usage will drop and major events will relocate if public transport and parking is inadequate.	The Council refers to previous responses about need for such facilities to be accessible	No
Mayor of London	Section 4.3	The Mayor welcomes Barnet's commitment to deliver 46,000 homes over the 15-year plan period (2021 to 2036) which equates to 3,066 homes a year. This is in excess of its Intend to Publish London Plan 10-year net housing completions target of 23,640 homes between 2019 and 2028. Of this Intend to Publish London Plan target, 4,340 completions should be identified from small sites. In this regard, the Mayor welcomes the acknowledgement that 5,100 homes in Barnet will come from small sites. With regards to the delivery of small sites, the Panel Report specifically states that the small sites target in the London Plan can be taken to amount to a reliable source of windfall sites which contributes to anticipated supply and so provides the compelling evidence in this respect as required by paragraph 70 of the National Planning Policy Framework of 2019. While Barnet's Local Plan needs to consider the National Planning Policy Framework 2019, the Planning Practice Guidance (Paragraph: 013 Reference ID: 2a-013-20190220) is clear that where a spatial development strategy has been prepared by the Mayor, it is for the relevant strategic policy-making authority to distribute the total housing requirement which is then arrived at across the plan area. Barnet's housing target is set out in the London Plan. Barnet's 10-year housing target is based on the borough's capacity as set out in the London Strategic Housing Land Availability Assessment 2017, which Barnet fed into; and a methodology for small sites. The Mayor is working with Barnet and other London Boroughs to deliver transport improvements that were not considered as part of the SHLAA process. The Mayor supports further work to assess whether additional homes and jobs could be brought forward as a result of these transport improvements, subject to no significant conflicts with other policies in the London Plan.	Agreed. Revisions to the Reg 19 clarify the contribution that small sites will make to the housing target. The Council looks forward to working with the Mayor on delivering transport improvements.	yes
St William Homes LLP	Section 4.3	The draft Barnet Local Plan indicates that the Housing Trajectory (Figure 3) reflects the housing target in the 2016 London Plan and makes it clear that this will be updated when the London Plan is published; however, Table 4 indicates a draft London Plan (2017) figure of 3,134, which is more than the targets noted in Barnet's draft policy. The latest version of the London Plan (Intend to Publish version December 2019) (ItP), sets a 10 years target for Barnet of 4,340. By Regulation 19, the new London Plan should be adopted and Barnet's housing targets will need to confirm to a higher housing target. We also express serious concerns that the plan would be unable to deliver the 46,000 dwellings which it currently plans for and the plan would fail to deliver a suitable provision of housing during the early years of the plan period.	The housing target is now the London Plan target of 35,460. Through the Local Plan we can demonstrate that this target is deliverable Barnet's Local Plan needs to be in general conformity with the replacement London Plan.	No
Mill Hill Missionaries (Knight Frank)	Section 4.3	It is our recommendation that the SHMA figure (3,060 dpa / 30,600 homes in total) is used as a minimum figure. However, in light of the Secretary of State's response to the 'Intend to Publish' London Plan published 13th March 2020, it is recommended that Barnet's housing figure is commensurately increased to show how it has endeavoured to accommodate an element of the circa 140,000 unmet need. A recommended starting point would be for the Council to first focus on its own unmet need of 7,700 dwellings over the 10-year London Plan period.	The housing target is now the London Plan target of 35,460. Through the Local Plan we can demonstrate that this target is deliverable	No
Developing London Ltd	Section 4.3	The Consultation document is clear that at this stage, insufficient sites have been identified to ensure housing needs can be met over the entirety of the Plan period. Furthermore, there is a clear need for additional social and green infrastructure which will only become more pressing as the Plan progresses. It is, therefore, in the interests of proper planning that sites in the green belt are considered to accommodate the identified need.	The housing target is now the London Plan target of 35,460. Through the Local Plan we can demonstrate that this target is deliverable	No

St William Homes LLP	Section 4.3	<p>The draft Plan's target to deliver a minimum of 46,000 new homes between 2021 and 2036 as stated in draft policy BSS01 'Spatial Strategy for Barnet' and Table 4, equates to 3,060 homes per annum. This figure is based on the Barnet SHMA 2018, which <b>did not</b> follow the Government's standard methodology for calculating local housing need as introduced by MHCLG. Paragraph 60 of the NPPF (2019) states that '<i>strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach.....In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.</i>'</p> <p><i>9. Figures published in February 2019 show that application of MHCLG Standard methodology would increase Barnet's minimum housing requirement to 4,126, an increase of 1,066 new homes per annum. In order to be found 'sound' at Examination stage, the Local Plan needs to accord to the NPPF to demonstrate that it has been positively prepared and is justifiable and therefore should adopt the 'standard methodology' approach to calculating housing need.</i></p>	<p>The housing target is now the London Plan target of 35,460. Through the Local Plan we can demonstrate that this target is deliverable</p> <p>Paragraph 0.0.21 of the London Plan 2021 sets out that boroughs do not need to revisit the housing targets set by the Mayor. In addition to this paragraph: <b>013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance</b> is clear that where a spatial development strategy (in this case the LP2021) has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to revisit their local housing need figure when preparing new strategic or non-strategic policies.</p>	No
Whetstone Properties Ltd (Simply Planning)	Section 4.3	<p>We consider that the Green Belt review undertaken to date has been completed through the blinkered lens that the minimum housing need for the borough is the figure of 46,000 provided by in Barnet SHMA, which has resulted in a significantly depressed housing need compared to the Standard Methodology. Based on this dampened housing need, the Council has failed to fully consider and assess whether the requirements of paragraphs 136 &amp; 137 of the NPPF have been met and if exceptional circumstances exist for the release of Green Belt Land. In addition, this needs to be considered in the context of the Panel Report / Recommendations and Letters from the Secretary of State, which requires the Mayor to undertake an immediate full review of the Green Belt and London Plan to determine if any suitable sites exist for release. This is highly likely to be required, given the panel's conclusions on the ability for London to meet the minimum housing need using the Standard Methodology using existing land capacity. Therefore, the London Borough of Barnet should be proactively undertaking the same assessment, to ensure the soundness of its plan.</p>	<p>The Green Belt study was carried out in accordance with the NPPF and within the framework provided by the London Plan. The draft Local Plan demonstrates how Barnet will accommodate growth through Policies BSS01 and GSS01. As such, the review does not support making the case needed to demonstrate that exceptional circumstances exist sufficiently to justify making revisions to the existing Green Belt and MOL boundaries. Barnet's Green Belt Study will help inform any future London wide review led by the Mayor. Any revisions to Green Belt / MOL made through the next review of the London Plan will be reflected in the Local Plan after this.</p>	No
Mill Hill Missionaries	Section 4.3	<p>This target of 3,060 should be applied over the 10-year target instead as a minimum target – thereby resulting in a minimum of 30,600 homes in total between 2019/20 and 2028/29.</p>	<p>The NPPF sets out that strategic policies should be prepared over a minimum 15 year period. Local planning authorities must review local plans at least once every 5 years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community.</p>	No
LB Barnet Estates	Section 4.4	<p>This section should include and emphasise the economic contribution Higher Education makes to the local and London economy. The sector provides jobs and employment for caretakers, gardeners, residential wardens, cleaners, receptionists and maintenance workers as well as skilled staff including professors, lecturers, researchers, librarians, administrators and I.T technicians. Universities purchase goods and services from other sectors which stimulates employment in other parts of the local economy. We propose that the following para is inserted at 4.4.5: "The provision of higher education and research makes a major contribution to Barnet's local economy and is also a source of direct and indirect employment supporting local businesses and providing residents with employment. The Council will support providers of further and higher education by encouraging new and improved facilities such as those proposed at Middlesex University's Hendon campus and wider Hendon Regeneration Project".</p>	Agreed	Yes

Friends of Finchley Way Open Space	Section 4.4	Support the need for town centres to diversify away from concentration on retail.	The Council welcomes this support	no
Middlesex University (Tibbalds Planning)	Section 4.4	Outlines growth plans in relation to jobs and the economy. At present it does not acknowledge the importance of the existing further and higher education sector establishments to the economy of Barnet, as providers of direct and indirect employment, as well as providing educational, training, CPD and business support services to local residents and employers. The University suggests adding a new paragraph after 4.4.4 which states: <i>“The provision of higher education and research makes a major contribution to Barnet’s local economy and is also a source of direct and indirect employment supporting local businesses and providing residents with employment. The Council will support providers of further and higher education by encouraging new and improved facilities such as those proposed at Middlesex University’s Hendon campus and wider Hendon Regeneration Project”</i> .	While it is acknowledged that Middlesex University is an important employer in the Borough in a range of skilled and unskilled job this section of the Local Plan is aimed at attracting jobs into the Borough into the proposed Growth Areas and Town Centres.	yes
Friends of Finchley Way Open Space	Section 4.5	While very much support expansion of open spaces and outdoor sports and recreational facilities, it is important to improve access by ensuring sufficient car parking spaces and frequent public transport services from transport and housing hubs. There is no bus from Finchley Central to Cophall or the North London Leisure Park. Many activities offered by GLL serve a wide geographical area and are targeted at older people who are likely to find it difficult to access Cophall by current public transport. (para 4.5.1)	In order for such new facilities to be successful the locations have to be accessible. The Plan promotes this accessibility.	No
Brent Cross South Partnership	Section 4.5	The identified hubs should not preclude other health/sporting/leisure opportunities coming forward. We suggest the following text is added to the end of para 4.5.2 “...and will support other initiatives elsewhere in the Borough, such as at Brent Cross where improvements will be delivered to sporting and leisure facilities within Clitterhouse Playing Fields”.	There is no need to make specific references to improvements elsewhere	No
Brent Cross South Partnership	Section 4.7	Further clarity is needed on the relationship between London Plan designated Opportunity Areas, Barnet Growth Areas, and “Opportunity Sites”. Brent Cross/Cricklewood is an identified Opportunity Area within the draft London Plan and the objectives of draft London Plan policy SD1 part B should be explicitly recognised.	Agreed. This has been clarified elsewhere in the Reg 19	Yes
Brent Cross South Partnership	Section 4.8	Brent Cross South Limited Partnership (‘BXS LP’) is bringing forward the comprehensive development of the Brent Cross South part of the Brent Cross Growth Area as identified and allocated within the Draft Local Plan pursuant to an outline planning permission (ref. F/04687/13) for Brent Cross Cricklewood (‘BXC’). Overall, the Draft Local Plan is well written and helpful in providing updated policy objectives and direction for the Borough up to 2036. We welcome the importance attached to realising the comprehensive development of the Brent Cross Growth Area. The Growth Area, and in particular Brent Cross South, is capable of delivering very significant regeneration benefits and making a substantial contribution to Borough targets for new homes and jobs. We are aware of the letter from Secretary of State for Housing, Communities and Local Government to the Mayor of London dated 13 March 2020, which calls into question elements of the draft London Plan. In light of that letter and as noted below, it is important to ensure that the Borough’s growth areas can be fully optimised.	Agreed. The housing target is now the London Plan target of 35,460. Through the Local Plan we can demonstrate that this target is deliverable	No
Brent Cross South Partnership	Section 4.8	In line with the draft London Plan, the ability to optimise and intensify sites, and housing delivery within them, is key: further intensification should be supported, where possible. A number of growth areas sit in close proximity to the Brent Cross Growth Area, namely Brent Cross West Growth Area and Cricklewood Growth Area, as well as Staples Corner Growth Area (in LB Brent). This should be recognised within the Draft Local Plan and, where feasible, links and co-ordination between these neighbouring areas of change promoted. Terminology and references to ‘Brent Cross’ within the Draft Local Plan need to be consistent and clear (and defined): references to ‘Brent Cross’ should, in our view, mean the wider Brent Cross Cricklewood area.	Agreed. This has been clarified throughout the Reg 19 document.	Yes
Brent Cross Dev Partners	Section 4.8	The DPs own the Brent Cross Shopping Centre which was the first large enclosed shopping centre to be built in the UK and set a new standard for destination shopping. The centre remains an iconic retail	The Reg 19 recognises the critical importance of BXC to the Borough and the wider sub-region	No



		and leisure destinations with a forty-year history serving North London. The DPs also own the Brent South Shopping Park which is situated to the south of the Shopping Centre across the A406. The DPs have been working with LBB for a significant number of years to progress the redevelopment of these sites to assist in the regeneration of the wider area. Planning (Ref No C/17559/08) for the comprehensive redevelopment of the BXC Regeneration Area was granted in Oct. 2010, and following this, a Section 73 permission (Ref No F/04687/13) was granted by the Council in July 2014 ("2014 Permission"). The regeneration of BXC will realise the Mayor's long-term aspirations for this key strategic Opportunity Area. The development will bring some 27,000 jobs, 7,500 new homes, a new town centre, a new commercial district and a new high street together with parkland and open space. The plans will also deliver substantial investment into transport and community facilities, including new schools, health facilities, public transport interchanges, bridges and road junctions. Since the 2014 Permission was secured, significant progress has been made to date in securing the necessary planning consents. In respect of Brent Cross London (land around Brent Cross Shopping Centre and surface car parks) and associated infrastructure, the DPs have obtained approval for the detailed design for both Phase 1A (North) and Phase 1B (North) and have discharged a large number of pre-commencement conditions. In addition, in December 2017, the Secretary of State approved the CPO's for parts of both the northern and the southern areas of the development. In spite of this progress, the UK retail market has been experiencing major structural and conceptual changes with the closure and consolidation of major national stores and brands. Most significant amongst these is the substantial and continuing move from shop-based retail purchases to on-line retail. Given the continued economic uncertainty a sufficiently flexible planning policy context is required to ensure that a successful and sustainable scheme can be delivered. The DPs have been working with the Council for over two decades to deliver a scheme which will provide the Borough with the regeneration that it requires. The regeneration of BXC is critical not only to future success of the local area but also to North London. It is therefore important that emerging policy context does not limit the ability to deliver the comprehensive redevelopment of the area and constrain the wider economic benefit to the local area and beyond.		
Chris Carabine	Section 4.8	The plans for Brent Cross Growth Area boast retail space and assumed employment when retailers are suffering substantially from internet retailer competition. These plans were made 11 years ago when the demand for retail space was higher and I fear they will not contribute substantially to the growing employment needs.	The Reg 19 recognises the critical importance of BXC to the Borough and the wider sub-region. Given the continued economic uncertainty a sufficiently flexible planning policy context is required to ensure that a successful and sustainable scheme can be delivered.	No
LB Enfield	Section 4.8	At this stage, Enfield Council also requests confirmation from Barnet Council as to whether there any other identified unmet needs that would require a formal request under the requirements of Duty to Cooperate.	There are no other unmet needs identified. This will be reflected in our Statement of Common Ground with LB Enfield.	No
Friends of Finchley Way Open Space	Sections 4.7 to 4.11	The focus of growth around the western areas of the Borough that are already being developed seems sensible in the light of limited resources, especially labour and skills. Brent Cross north (4.9)/Brent Cross south (4.10)/Brent Cross Thameslink (4.11). Support the development of new and better transport infrastructure.	Support welcomed.	No
Brent Cross South Partnership (DP9)	Para 4.10.1	The final sentence of this paragraph should be amended: "The Section 73 planning permission for Brent Cross includes requirements for the new homes to be supported by new and improved schools, community, health and leisure facilities, as well as, improved parks and open spaces."	Agreed	Yes
Brent Cross South Partnership (DP9)	Para 4.10.1	As per the comments on policy GSS01 above, the new homes figure to be provided at BXS should allow for optimisation. We also suggest additional text to state that new homes should comprise different types and forms of accommodation to meet needs and to assist with speed of delivery. The final sentence of this paragraph should be amended: "The Section 73 planning permission for Brent Cross includes requirements for the new homes to be supported by new and improved schools, community, health and leisure facilities, as well as, improved parks and open spaces."	The Plan supports different types and forms of homes so an explicit reference is not merited. Similarly with optimisation	No

Brent Cross South Partnership (DP9)	Para 4.10.2	Opportunities for optimising land and increasing site capacity should be supported	These are supported throughout the Local Plan	No
Former MHNF	Para 4.11.1	Brent Cross Thameslink. We question the proposed location of the new station at 'Brent Cross West'. The distance of both this station and the existing station Brent Cross (Northern Line) is too far distant from the main shopping centre to be of real use to shoppers, particularly those who are carrying heavy bags of shopping. We are also astonished at the sum to be spent on this development £416.5m! This sum, or at least a good part of it, should be used on much needed orbital transport projects across north-west London. We are also keen to see delivery of passenger journeys via the freight line at Dudden Hill through to west London.	A framework for the Brent Cross West area will be progressed. Local Plan Reg 19 reflects progress on the Station and the West London Orbital.	No
Finchley Society	Para 4.12	Brent Cross is a major shopping destination for many Finchley residents and support continued use of the existing Brent Cross facilities as a destination shopping and leisure centre for local residents and those from further afield. However, in keeping with the need to reduce car journeys, developments in Finchley's town centres should allow for improved local retail offers for Finchley residents.	The Council considers that the policy framework in the Plan will support an improved offer for all town centres	No
Former MHNF	Para 4.12.2	We agree heartily with the comments here. We have stated this repeatedly.	Support welcomed.	No
Former MHNF	Para 4.12.3	We question whether 'larger, more dominant centres' will continue to be the focus for activity for consumers and tenants. A mixed-use approach would seem to be preferential, complemented by the smaller centres providing more niche and everyday needs. Our reasoning has already been stated above. Mind the 'Gap' quoted here. Does it really exist in 2020, and even more so in the Plan period?	The Plan recognises the changing nature of retail, particularly in response to COVID19, and encourages an appropriate mix of uses.	No
Former MHNF	Para 4.12.4	Following the points raised above we again question the enormous expansion of Brent Cross.	The successful regeneration of Brent Cross will ensure it remains a major shopping and leisure destination.	No
Brent Cross South Partnership (DP9)	Para 4.12.6	The first residential completions should be stated as 2022/2023 (not 2021/2022).	Agreed	Yes
Friends of Finchley Way Open Space	Para 4.13.3	Look forward to seeing and commenting on the indicators and milestones Barnet is developing to monitor progress on the Brent Cross Growth Area.	These indicators are set out in the Reg 19	Yes
Brent Cross South Partnership (DP9)	Para 4.14.6	This paragraph should be clarified as follows: "The existing strategic highway network in the area is already congested with the junction between the A406 and the A5 at Staples Corner at capacity at peak times." It should also be recognised that there may be alternative mitigation measures (e.g. public transport enhancements) to enable housing delivery.	Agreed	Yes
LB Brent	Para 4.14.7	The Brent Cross West Growth Area adjoins the Staples Corner Strategic Industrial Location in LB Brent which is identified in the Brent Local Plan as a growth area for industrial intensification and potential housing delivery. The Council welcomes Barnet's recognition of the capacity for positive changes to the wider area, the potential of which is also identified within the emerging draft Brent Local Plan.	A framework for the Brent Cross West area will be progressed and we look forward to working with LB Brent on producing this. This will be reflected in our Statement of Common Ground with LB Brent	No
Middlesex University (Tibbalds Planning)	Para 4.17.7	Additional bullet point : "Comprehensive redevelopment of Middlesex University's Platt Hall and Writtle House site".	Agreed	Yes
Geoffrey Silver	Para 4.18.1 Site 49	Section 4.18.1 "identifies Mill Hill East as an area for intensification ... defined as typically built up with good public transport", but the Watch Tower Site 49 is hardly built up and has a low PTAL of 1b. Site 49 is completely unsuitable for intensification.	Any future development proposals for Site 49 will be required to carefully consider its suburban semi-rural character, the Green Belt and Conservation Area status in line with the relevant policies contained within the plan	No

Former MHNF	Para 4.18.4 & Policy GSS07	<p>It is a great shame that the build out of Millbrook Park has taken so long, while residents around it suffer from living in a building site. Delivery of only 600 homes since 2009 is a great disappointment. The constant upheaval for local people is extremely tiresome. Those who have moved into Millbrook Park are experiencing a shortage of car parking provision, leasehold restrictions and issues with site managers on a daily basis. They are generally not happy. Barnet should have a Code of Construction Practice, similar to that in place at the Royal Borough of Kensington &amp; Chelsea. The London Atmospheric Emissions Inventory 2013 estimated that total emissions from Non-Road Mobile Machinery, comprising emissions from construction and industrial off-road machines combined, was responsible for 10.0% of PM2.5 emissions generated within the City of Westminster in 2013 and will be 5.7% in 2020. This makes it the third and fourth largest source of such pollution in 2013 and 2020 respectively. It is difficult to see where an additional 1400 new homes will come from. We assume the NIMR site with currently 514 homes approved is included. It will be interesting to see TfL's detailed plans for 127 homes to be built around its station. It is vital that such a development does not remove the potential for expansion of the station to deliver additional train service capacity or indeed a future through line to Mill Hill Broadway and Edgware.</p> <p>The latest planning application for IBSA House is for 197 homes (19/6551/FUL) but may not get approved at that level. It is however likely to be more than the 125 quoted at Site 46. Then site 49 the Watchtower could be 219 as stated. We await detailed plans but are mindful that it is in Green Belt and in beautifully landscaped gardens, on a steep hill, which would make the site very challenging particularly for the disabled. We are still 350+ under the 1400 suggested. Where do you see those being provided? We note that the maisonettes on Bittacy Hill (uphill from Sanders Lane) are close to their end of life and expect that their regeneration could be included in your assessment. Are these properties Council (or Barnet Homes) owned? A planning framework for Mill Hill East was established with the MHEAAP and this should be updated into a masterplan for the whole area, notably fully assessing the transport and other infrastructure necessities of the combined area.</p>	<p>The Local Plan sets out an ambitious growth strategy for the borough, with a large number of new homes projected over the plan period up to 2036. Development and intensification are aimed at areas within the Borough able to accommodate it and with appropriate character to absorb new more dense building typologies.</p> <p>Any future development proposals for this site will be required to carefully consider its suburban semi-rural character, the Green Belt and Conservation Area status in line with the relevant policies contained within the plan.</p>	No
Finchley Society	Para 4.19.2	This paragraph should admit that with residential development in town centres there are inevitably problems with noise and absence of amenity space.	Agreed. Reference has been made to the need to address these issues as part of town centre living.	Yes
Finchley Society	Para 4.19.5	Welcome this recognition that dependence on the car can and should be reduced.	The Council welcomes this support	No
Clive and Gill Hailey	Para 4.2.1	Agree that "New housing ... must be accompanied by suitable supporting infrastructure including transport, schools, healthcare and open spaces" and that this needs to be addressed before and in conjunction with starting building, not after!	The system is based on contributions from implemented development funding the infrastructure rather than before it.	No
Former MHNF	Para 4.2.2	We agree strongly with the aims of 4.2.2 We would like some objective standard to be adopted in respect of 'character, design and heritage'. (See 'Living with Beauty' document issued January 2020, by the Building Better, Building Beautifully Commission).	The Council welcomes this support. The Reg 19 references the work of the BBBBC.	No
Clive and Gill Hailey	Para 4.2.3	Agree that "Growth must be beneficial for existing and future Barnet residents" but concerned how this is to be reliably measured and quantified.	Monitoring Indicators are set out in Chapter 12. The Council publishes an Authorities Monitoring Report and Regeneration Report every year. These two documents set out measurements of growth	No
TfL	Para 4.20.11	We support the redevelopment of station car parking to deliver growth and as part of a shift towards sustainable travel. The Intend-to-Publish London Plan sets that car-free development should be the starting point in all well-connected locations, and that provision should reflect the new approach and not exceed this based on previous provision. Any station car parking retained must therefore be assessed against the same test proposals for a new station with a car park would be subject to. Where there is sufficient bus access to the rail lines in question, we strongly urge the Council to support the reduction in commuter car parking as part of redevelopment at stations.	Our approach on the development of surface car parks is set out in GSS12. Our approach on car-free development is set out in TRC03. These policies will help the Council to make informed decisions on proposals involving station redevelopment.	No

Theresa Villiers	Para 4.20.11	Concerned at the suggestion that station car parks, such as Woodside Park, should be used for residential purposes. Note that the council envisages re-providing car parking spaces in a different way (presumably by basement or multi-storey car parks) but retention of parking spaces at stations is very important.	Our approach to the redevelopment of station car parks is based on a combination of Policies GSS12 and TRC03. These policies will help the Council to make informed decisions on proposals involving station redevelopment and the extent to which parking spaces are re-provided..	No
Finchley Society	Para 4.20.11	Support this.	The Council welcomes this support	No
Former MHNF	Para 4.20.11	Only zero-emission vehicles should be permitted in the Undercroft beside Mill Hill Broadway main railway line. Noxious emissions are 150% over acceptable targets. Consideration must be given urgently to the construction of a multi storey car park in Bunns Lane close to the station. This will also encourage a reduction in car use by travellers going into central London. Together with Step-Free Access, increased numbers of passengers will then start to use main rail line connectivity from the areas of Mill Hill, Burnt Oak and Edgware. This is a key objective for the Forum. (Site 33) We see that the provision of adequate car parking spaces in centres that the public visit is extremely important if they are to “thrive”. While parking has been limited in new developments, (many say unreasonably and unrealistically) almost NO EXTRA PROVISION has been made available at railway stations, and town centres to meet the needs of the extra residents. While we understand the hope from public offices that people will reduce their dependency on the private car, a massive deficit currently exists in parking provision at these public places, thus having the opposite effect. At the end of September 2019, there were (according to the RAC) 38.9 million licensed vehicles in Great Britain, a 1.3 per cent increase compared to September 2018. The level of growth has declined, due to the economic uncertainty, and improved reliability, rather than because people are finding other forms of transport. We see TfL desperate to develop housing on car parks at stations to repair their finances, and while some developments may be of benefit locally, they must not come forward without adequate re-provisioning of car parking spaces. This would be a highly retrograde step, making the use of public transport for many totally untenable. Further initiatives to encourage greater use of public transport, walking or cycling, may reduce the number of car journeys but, they are unlikely, at least in the short term, to reduce car ownership!	When car parks are re-developed we will not seek a increase in spaces. The Local Plan endorses a greater range of sustainable transport options and a modal shift to reduce car travel, which will include the Healthy Streets approach to reduce car dominance and improve street safety, comfort and amenity to promote walking and cycling.  This approach is supported by the Car Parking Study, Long Term Transport Strategy and the Sustainable Transport Assessment	No
Finchley Society	Para 4.20.12	Support and urge the Council to give priority to the preparation of planning briefs, to ensure that the public interest is considered ahead of the private interests of landowners and developers. We note the lack of framework documents, such as site briefs, for the Finchley Central TfL development and are concerned that this development not in keeping with this draft Local Plan.	The Council will continue to consider opportunities for more detailed planning frameworks within the parameters of a reformed planning system	No
Friends of Finchley Way Open Space	Para 4.20.13	I'm not sure that Woodside Park can support further development around the station. (para 4.20.13)	The Local Plan supports development in locations with good public transport access.	No
Finchley Society	Para 4.20.13	While Woodside Park station is not located within North Finchley Town Centre, it is an integral part of the Centre's infrastructure. Priority should be given to improving the link between the station and areas along the High Road, through much more frequent bus services from the station (utilising low-emission vehicles).	The relationship between Woodside Park and North Finchley Town Centre was highlighted in the 2018 SPD. Agree that the pedestrian link should be reflected in Local Plan.	Yes
Barnet Society	Para 4.20.1-6	Crossrail 2 is a very long way off. Shorter-term is the probability that the existing Great Northern local service between Moorgate and Welwyn Garden City will be taken over by TfL's Overground network. This suggests that the Oyster facility will be extended to stations beyond Hadley Wood. Given line capacity restrictions between Finsbury Park and Moorgate, any increase in local services through Oakleigh Park, New Barnet, etc. would be best achieved by extending Crossrail 2 journeys north of New Southgate. In turn, this would help boost New Barnet as a retail, employment and residential hub.	The Plan has been updated to reflect the prospects for delivery of Crossrail 2	Yes

TfL	Para 4.20.2	Correct the description of the West London Orbital to say: 'The WLO will deliver a new passenger service along existing tracks between Hounslow/Kew Bridge and Hendon/West Hampstead Thameslink, passing through Old Oak Common, Neasden, Brent Cross West and Cricklewood.'	Agreed.	Yes
Barnet Society	Para 4.21.1-4	Redevelopment of estates needs to facilitate bus access. Through bus routes should be created where possible (with adequate road width) and cul-de-sacs minimised. If necessary, bus stops should be added to keep residents within 400m of a stop.	Penultimate bullet of policy GSS10 refers to needing to demonstrate sufficient access to public transport.	No
Theresa Villiers	Para 4.22.1	Whilst seeing the merit of development along major thoroughfares, proposals for 7 storey development around Whetstone and Chipping Barnet would increase population excessively and add pressure to local infrastructure provision.	Policy CDH04 revised to make clear that definition of a Tall Building and identification of strategic locations where tall buildings may be appropriate does not mean that all buildings up to 8 storeys or to a height of 26 metres are acceptable in these locations or elsewhere in the Borough. Such proposals will be assessed in the context of other planning policies, in particular Policy CDH01 – Promoting High Quality Design, to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area	Yes
New Barnet Community Association	Para 4.22.1	Remove A110 East Barnet Road as a major thoroughfare as it is completely out of character from the other routes.	Safeguards are provided through Policy GS11 which will ensure that design relates to suburban streets behind the thoroughfares	No
Clive and Gill Hailey	Para 4.22.1	There have been several recent instances of local developers / planners getting confused by local road numbering and the capacity of said roads! It must be clarified that only the section of East Barnet Road (identified as the A110) can be considered a Major Thoroughfare. To clarify, East Barnet Road through East Barnet Village (from Brookhill Road to Church Hill Road) is not part of the A110 and is not classified as a major thoroughfare.	Safeguards are provided through Policy GS11 which will ensure that design relates to suburban streets behind the thoroughfares	No
Barnet Society	Para 4.22.2	An important aspect of denser development is ensuring that bus flow and bus-stop location is given early attention. Bus lanes can be valuable in congested areas, but there is only limited scope for them in Chipping Barnet. Of greater benefit would be more attention to, and enforcement of, waiting restrictions on one or both sides of bus routes.	Such detailed issues are considered in discussions between Highways colleagues and TfL as part of detailed planning proposals.	No
Former MHNF	Para 4.23	We also note that you barely mention "Air Quality" in most policies in this section. This clearly needs to be addressed in the light of commitments to Carbon Neutral target deadlines.	Proposals are required to meet the air quality measures set out in Policy ECC02.	No
Finchley Society	Para 4.24	This section should include something about those parks which have historic or heritage characteristics or include historic structures. It should also cover golf courses, of which there are nine in Barnet; they take up as much land as all the public parks, and though they are used for sport/recreation, they are not open to the general public.	Agreed in part. Reference made to Barnet's historical parks and gardens.	Yes
Elizabeth Silver	Para 4.24	Change: Cut down on the number of pay-for leisure facilities and remove the words "Ancillary facilities". Specify what "accessibility" means. Add: The main task is maintenance i.e. litter collection and landscape gardening such as mowing of lawn spaces, pruning, tree care, planting shrubs etc. Commercial and organised leisure developments should be discouraged as they discriminate against low-income groups and those who just wish to cycle, run, walk their dog or watch wildlife. This is crucial for the education of the next generation to respect our natural world. Supporting Comments: What is actually needed in these places is litter collection, and landscape gardening such as mowing of lawn spaces, pruning, tree care, planting shrubs etc. not development as described. It is extremely worrying that the accent here is on over-development, such as changing facilities or a BMX/skate park. As soon as one of these has less maintenance, it becomes ugly and derelict, and the space becomes ripe for more building projects. Any building on green space is a precedent for more	The Council aims to provide a range of parks, open spaces and leisure facilities across the borough to suit the needs of all users. ECC04 seeks to optimise the benefits of open space and create more accessible green spaces through a range of measures.	No

		development and compromises the green spaces for future generations. Copthall is a prime example of this. Organised leisure facilities are often associated with litter, as seen in the area around Copthall. Ancillary facilities could be another name for developments. "Appropriate ancillary facilities" should be specified and not be supported if they take the place of green space or increase the amount of concrete or built-on space. All maintenance equipment should be stored off-site as otherwise it will get stolen. This many organised/pay-for recreation facilities conflicts with keeping the area as a natural space (and Welsh Harp is an SSSI), harming wildlife and discouraging walkers, joggers and cyclists. People who enjoy free activities such as walking and cycling, tend to avoid over-developed centres of leisure. Commercial activities discriminate against low-income groups.		
Finchley Society	Para 4.24.2	This study should cover the disbenefits, as well as the benefits, of tourism and look at how the use of properties for short-term visitor accommodation (such as Airbnb) may constrain residential availability for local residents. The short-term letting limit of 90 days for whole properties, abuse of which is reportedly widespread, should be much more strongly enforced.	The impact of short stay accommodation is addressed at Policy HOU05 – Efficient Use of Barnet's Housing Stock	No
Mill Hill Preservation Society	Para 4.24.3	Connections to adjacent open spaces Arrandene Open Space, Mill Hill Park is not the case.	This reflects the Copthall masterplan	No
Finchley Society	Para 4.24.3	The Playing Pitch Strategy showed there are 16 adult football pitches not used for playing football, which is unacceptable. If these low-quality pitches cannot be made useful, they should be turned into public parks and greenspace with all-weather paths.	The Playing Pitch Strategy is undergoing review and will update current and future supply and demand assessments for each of the sports being considered	No
Barnet Society	Para 4.24.3	The proposed sport and recreation hub at Barnet Playing Fields comprises a building as big as a small primary school plus a floodlit outdoor games area and parking for 65 cars, right in the middle of playing fields. This would be a flagrant breach of the openness of the Green Belt – and quite unnecessary since other, far less conspicuous (and probably cheaper and more convenient) sites exist close by.	The Council considers there to be a case for very special circumstances to justify the creation of the sports hub in this location..	No
Friends of Finchley Way Open Space	Para 4.24.4	I strongly advise that the assessment system for parks and open spaces is revised. At present too much emphasis is placed on the presence of man-made facilities such as toilets and cafes. If more is to be made of Dollis Brook and the Green Valley Walk, as well as other smaller open spaces, it must be possible to value their contribution to the health and wellbeing of all animals, flora and fauna and not just to humans in assessing their value and quality to society. There is scientific evidence that animals and fish become more aggressive when crowded together. The creation of a hard surface path close to Dollis Brook along the south side of the Finchley Lawn Tennis Club has created flooding of the open area, ruining the flora. Hard surfaces that break-up habitat in this way can be detrimental to wildlife. The provision of toilets often leads to vandalism and cafes to rubbish which can be hazardous when dropped and blown about and even when placed in bins has to be collected by the Council. Suggest that the Council explore using an ecosystem services approach to the valuation of open spaces.	The methodology of assessing the value and quality of a park in the Barnet Parks and Open Spaces Strategy was about much more than just parks facilities.	No
Canal & River Trust	Para 4.24.4	Note the aims to maximise the access to and potential of the key river valleys throughout Barnet namely Dollis Brook, Pymmes Brook and Silk Stream to support leisure, recreation and active travel. Pymmes Brook eventually feeds into the Lee Navigation, which is owned and managed by the Trust. Misconnections and other pollution entering Pymmes Brook can end up in the Lee Navigation, adversely affecting its water quality. We therefore support enhancement of these waterways, in addition to public access, recreation and active travel, as described in paragraph 4.24.4. However, the Trust only owns the Silk Stream between the Brent Reservoir and the A5.	Support welcomed and details of ownership noted.	No
Finchley Society	Para 4.24.4	The assessment system for parks and open spaces must be revised. There is currently too much emphasis on man-made facilities such as toilets and cafés. It should be possible to value the contribution of open spaces to the health and wellbeing of all animals and plants, not just humans. There is scientific evidence that animals and fish become more aggressive when crowded together. The hard surface path close to Dollis Brook along the south side of the Lawn Tennis Club has created	The Council is preparing a Sustainability Strategy and is committed to producing a Biodiversity Action Plan. These issues are best addressed through these policy vehicles.	No

		flooding of the open area, ruining the flora. Hard surfaces that break-up habitat in this way can be detrimental to wildlife. The provision of toilets often leads to vandalism, and cafés to rubbish which can be hazardous when dropped and blown about and even when placed in bins has to be collected by the Council. The Council should explore using an ecosystem services approach to the valuation of open spaces.		
Brent Cross South Partnership (DP9)	Para 4.24.4 and GSS13	Should recognise the contribution of Clitterhouse Playing Fields by specific reference, e.g. by adding a further sub-paragraph (e) to para 4.24.4, "improvements to Clitterhouse Playing Fields to enhance sporting and outdoor recreational facilities".	Agreed. Reference made.	Yes
Clive and Gill Hailey	Para 4.24.4 d)	Maximising the potential of the Pymmes Brook key river valley to support free leisure and recreational activities may have benefits but must be carefully controlled to maximise public use and access and to limit any commercialisation. However, 'active travel' along the Pymmes Brook Trail cycle route through Oak Hill Park could be extremely difficult to introduce without resulting in conflict with other park users' enjoyment. The problems experienced with the Dollis Valley Green Walk should be well remembered and not repeated.	There is no specific reference to the cycle route in the Local Plan	No
Finchley Society	Para 4.24.4b	No justification for the exclusion of Victoria Park, Cherry Tree Woods, and Avenue House grounds. Either produce a complete list or do not mention any specific parks.	This list largely reflects the contents of the Parks and Open Spaces Strategy and is not intended to set out all improvements	Yes
Barnet CCG	Para 4.3	Increased level of housing growth will require significant investment in social infrastructure, including healthcare which should be mentioned in this section on Barnet's Growth Requirements.	Chapter 8 reference and provide details on healthcare infrastructure provision requirements.	No
Brent Cross Dev Partners (QUOD)	Para 4.3	Para 4.3 outlines Barnet's growth requirements in respect of housing. It is noted that the Council are awaiting the final publication of the New London Plan and confirmation of the housing target. As such, Barnet's Housing Trajectory has been based on the housing target identified in the 2016 London Plan. The Council acknowledge that the Housing Trajectory will need to be updated when the London Plan is published. The DPs would like to reinforce this approach, and note that these updates, as well as any consequential updates required to other housing policies will be essential to ensure that the Local Plan complies with the New London Plan.	The housing trajectory is subject to annual update. A revised version is shown in the Reg 19 Local Plan	Yes
Barnet CCG	Para 4.3	It is noted that the green, social and physical infrastructure needed to support Barnet's growth will be set out in an Infrastructure Delivery Plan (IDP). The CCG will continue to work with the Council to identify future healthcare infrastructure requirements as part of the IDP.	The IDP has been published as part of the Local Plan evidence base	No
Home Builders Federation	Para 4.3.5	The Draft London Plan Intend to Publish version requires Barnet to provide 23,640 net additional homes between 2019/20 and 2028/29, or an annual average of 2,364. We note that the Council has referred to the sub-regional West London Alliance SHMA. This establishes an OAN for Barnet of 3,060 dpa. We acknowledge and welcome the Council's ambition to go further than the minimum targets in the Draft London Plan, although whether it has the deliverable land capacity to support this is another matter (we consider this below). We advise that the Council should use the figure of 3,060 as the basis for a ten-year plan rather than 15 years. This would require the plan to provide for 30,600 homes in total between 2019/20 and 2028/29 rather than 46,000 over 15 years. The Council's intention to deliver in excess of the minimum Draft London Plan target is supported by the Secretary of State's directed change number 8, with its modification to para. 0.0.21.	This Plan needs to be in general conformity with the London Plan. The Mayor has not raised an issue about the 15 year timeframe of Barnet's Local Plan.	No
Finchley Society	Para 4.3.6	Both the adverse and the beneficial consequences of so large a figure should be addressed.	This is addressed at Policy BSS01	No
Barnet Society	Para 4.3.6	Agree with FORAB that the target of 46,000 new homes is unrealistically ambitious.	This target has been revised with that of the London Plan	Yes
Clive and Gill Hailey	Para 4.4.1	The lack of adequate cross borough public transportation links mean that any new jobs created are really only for the benefit of those living within the same locality. This makes little or no sense.	Improvements to orbital transport links will improve job access opportunities within Barnet and the wider sub-region	No

Former MHNH	Para 4.4.1	We have questioned these assumptions earlier, both for retail and office space and therefore the number of new jobs to be generated, 27,000.	The Plan recognises the changing nature of retail and encourages an appropriate mix of uses.	No
Finchley Society	Para 4.4.1	Barnet is not an island, and therefore the desirability of having the employment in Barnet needs justifying.	Through safeguarding and supporting new employment floorspace Barnet is making a contribution to the overall economy of London	No
Clive and Gill Hailey	Para 4.4.2	The statement "efforts should be focused on protecting employment land" is admirable, if it were to result in generating and retaining local employment but such suitable areas are scarce and how can such protection be assured and implemented?	The Plan sets out a strong message on safeguarding employment land. This is backed up by the recent Article 4 on office to residential uses.	No
Redrow Homes	Para 4.4.3	Allow for potential of co-location of uses, including residential on certain Locally Significant Industrial Sites.	As part of the safeguarding of employment land co-location is not supported. This reflects the Intend to Publish London Plan (policies E6 and E7).	No
Brent Cross Dev Partners (QUOD)	Para 4.4.4	The DPs support the Council's recognition of the changing trends within the retail sector and the need for town centre's to diversity. We would request that this approach to diversification should be taken forward and reflected in the relevant policies. This is to ensure the planning policies are positively prepared in accordance with the provisions of the NPPF.	The Plan has been revised as part of the response to COVID19 and the need to support thriving town centres.	Yes
Finchley Society	Para 4.4.4	Given the negative trends in the UK retail sector, it is hard to believe that Barnet needs any additional comparison retail space. If the Council intends to allow new high-quality retail space in certain locations, it should have a clear policy on what to do with surplus space elsewhere. The realities of retail property are harsh, and the language here is too vague. Include the sentence: "In light of the adverse trends in the UK retail property market, the Council will need to address and encourage alternative uses for a growing amount of vacant retail space, particularly low-quality space and that located in marginal areas."	Targets for retail floorspace have been deleted	Yes
Brent Cross South Partnership (DP9)	Para 4.4.4 and 4.8.4	As noted above, the Zonal Floorspace Schedule within the Development Specification and Framework of the BXC permission specifies c.110,000m2 of retail and related uses site wide (c.78,000m2 North of the A406 and c.32,000m2 South of the A406). Consented floorspace both within Brent Cross North and South should be recognised as contributing to the town centre.	Text revised to clarify consented floorspace	Yes
Finchley Society	Para 4.5.1	Expansion of open spaces and outdoor sports and recreational facilities is supported, but it is important to improve access with sufficient car parking spaces and frequent public transport services from transport and housing hubs. (There is, for example, no bus from Finchley Central to Copthall or to the North London Leisure Park.) Many older people and young families who use the sports and recreational facilities, while not having a Blue Badge, may find it difficult to use public transport, through e.g. impaired mobility or having with them young children, swimming/football equipment, etc. Many of the activities offered by GLL (aka Better) are targeted at older people, such as body conditioning, yoga and Pilates.	Agreed that facilities such as Copthall can only be successful if they are accessible by a range of transport modes including the car. In supporting and planning for destination hubs it is essential that accessibility forms a fundamental element of proposals. The Great North Leisure Park is a residential led mixed use proposal within the Local Plan where we will seek improvements to public transport accessibility.	No
Friends of Finchley Way Open Space	Para 4.5.3	Support the proposal for a new Regional Park.	Support welcomed.	No
Friends of Finchley Way Open Space	Para 4.6.1	Major transport infrastructure - Is it realistic to include even partial completion of Crossrail 2 in the plan?	Local Plan revised to reflect progress of Crossrail 2	Yes
Brent Cross South Partnership (DP9)	Para 4.6.1	This para references the new Long Term Transport Strategy which "will inform a programme of priority transport investments that will support and address the strategic needs of Barnet". We note that there is parallel consultation process ongoing in relation to the draft Transport Strategy, and this Strategy will be important to informing the infrastructure-related policies moving forward. Further detailed comments may arise on the relevant aspects of the Draft Local Plan once this document is finalised.	Reg 19 has been informed by the Long Term Transport Strategy and the Strategic Transport Assessment	Yes



Clive and Gill Hailey	Para 4.6.1	Nothing works without the provision of a first class and reliable local transport network! Hopefully, the Council's new Long Term Transport Strategy will enlighten us greatly when it is published.	Reg 19 has been informed by the Long Term Transport Strategy and the Strategic Transport Assessment	Yes
Former MHNF	Para 4.6.1	We will respond in due course to the Council's Long-Term Transport Strategy document. This will include questions re additional retail space 55,000m2 at Brent Cross, and the 165,000m2 new retail space. Please see earlier comments on this subject. We need to see trends of footfall and transaction values over the past 10 years at Brent Cross Shopping Centre and at other town centres in order to judge whether a net increase makes sense, and if necessary, by how much.	There remains an extant consent for the regeneration of Brent Cross. Reg 19 has been informed by the Long Term Transport Strategy and the Strategic Transport Assessment s for the regeneration of Brent Cross.	No
Historic England	Para 4.7.2	It is appreciated that Barnet has been allocated an extremely ambitious housing target for the plan period. We therefore welcome the plan's intention to focus growth in specific identified areas, and to ensure development is delivered in a way that responds to the distinctiveness and individual characteristics of these areas to ensure good place making.	The Council welcomes this support.	No
Home Builders Federation	Para 4.7.5	We welcome and strongly support the Council's intention, as articulated in para. 4.7.5, to keep the housing land supply and trajectory under review. This review will help to inform a revision to the Local Plan in five-year's time.	The housing trajectory is updated on an annual basis through the Authorities Monitoring Report	No
Barnet Society	Para 4.7.5, Table 5 & Figure 3	Share FORAB's confusion over the housing figures. In addition, the red line indicates a London Plan annual target of only some 2,300 (whereas Table 4 states 3,134).	Table 5 and Figure 3 have been revised and updated	Yes
Finchley Society	Para 4.8	The Brent Cross plans should be completely revised in light of changes in the economy and the climate emergency. Economic trends are reducing the need for retail floorspace. New large shopping centres may not be commercially viable. Land use in Brent Cross should perhaps now focus on residential development, reducing pressure elsewhere. The climate emergency makes increased car-based shopping unacceptable. This type of shopping has higher emissions compared to using local centres or delivery services. Refurbishment of the existing shopping centres is far more carbon efficient than new construction (as the Council acknowledges elsewhere). Unnecessary driving for comparison shopping also exacerbates traffic congestion. The Council may be able to revise the agreement with developers and move towards a new plan in which the existing shopping centre is refurbished and more land is devoted to residential and community use.	Reg 19 document reflects the extant consent for the regeneration of Brent Cross and its role as a regional destination for retail and leisure	No
Brent Cross South Partnership (DP9)	Para 4.8.1	Note that the comprehensive development of this area will be phased. As referenced elsewhere, the terminology around 'Brent Cross' needs to be clear and consistent throughout the Draft Plan.	Agreed	Yes
Brent Cross South Partnership (DP9)	Para 4.8.2	The new Metropolitan town centre referenced in this paragraph should clearly relate to both north and south of the A406.	Agreed – see GSS02	Yes
Finchley Society	Policy GSS13	The Regional Park has been mentioned for many years. It would be highly desirable for Finchley residents and for Barnet generally. There is however a lack of any specific plans and funding for it. It should either be dropped as a meaningless ambition or made concrete through specific initial steps and investments.	The establishment of a Regional Park is at a very early stage. However it remains an ambition of the Council within the lifetime of the Local Plan.	No
Taylor Wimpey Strategic Land	Policy GS11	Sets out that development along main road corridors as identified on the key diagram (Map 2) is supported subject to a number of criteria. These locations are considered to have the potential to deliver 4,900 new homes. Although the principle of this approach to housing growth is supported, we consider that some key road corridors in the borough that could assist in delivering housing have been missed. .Colney Hatch Lane is a key route through the borough that connects Muswell Hill in the south with Chipping Barnet to the north, and which is intersected by the A406. This area has a PTAL of 3, therefore development along this road would be in a sustainable location. As a result, the inclusion of Colney Hatch Lane would be in accordance with NPPF para 8 which seeks to achieve sustainable	Colney Hatch Lane is not specifically identified in the Local Plan as a main road corridor suitable for infill and intensification. Policies in the Local Plan do not preclude undesignated sites with good PTAL coming forward.	No

		development, including through ensuring that sufficient land of the right types is available in the right places. LBB should therefore amend the key diagram to include Colney Hatch Lane as a major thoroughfare so that it can contribute to the housing proposed to be delivered through this category. The land east of Colney Hatch Lane could contribute to this housing requirement in accordance with the Borough's strategy to deliver sustainable growth.		
Mayor of London	Policy GSS008	Could be misread as the parking standards being minimums – should be made clear that parking provision should be minimised and not exceed standards in Tables 10.3 and 10.5 in Mayor's Plan	Agreed – wording clarified	Yes
Finchley Society	Policy GSS01	Penultimate paragraph - good that the Council will plan pro-actively, but be less mealy-mouthed, and say something that will show the Council means business. 'will be prepared to use' for 'will consider the use of'	Agreed	Yes
TfL (CD)	Policy GSS01	Comfortable with the suggested 1,000 homes capacity for TfL and Network Rail car parks. Suggest it should be a <b>minimum</b> of 1,000 homes.	BSS01 establishes the minimum boroughwide target of 35,460. Table 5 sets out the sources that contribute to delivering that minimum target. Setting the housing unit target as a minimum for each source is unnecessary and reduces flexibility.	No
Brent Cross Dev Partners (QUOD)	Policy GSS01	Relates to sustainable growth and identifies that there will be up to 165,000 m2 (net) of new retail floorspace across the Borough, with "up to 55,000m2 (net) of this at the revitalised Brent Cross Shopping Centre." Whilst the DPs support the inclusion of this reference to retail delivery at Brent Cross London, a non-material amendment Ref No 17/2528/NMA was granted in September 2017 which amended Condition 36.3 attached to the 2014 Permission so that the net additional comparison retail floorspace to be provided in Brent Cross London shall not exceed 56,600sqm of new comparison retail floorspace. The wording within Policy GSS01 and elsewhere in the Draft Local Plan should be updated accordingly. Draft Policy GSS01 also identifies that "The Council will create the conditions for sustainable growth to deliver the homes, jobs, retail floorspace and community facilities to meet Barnet's identified needs." This approach is endorsed by the DPs, however so as to ensure that the Draft Local Plan is positively prepared it is suggested that leisure and entertainment should also be included within the list of Barnet's identified needs.	Agreed -	Yes
LB Haringey	Policy GSS01	Welcomed but would emphasise importance of a robust IDP	IDP published in February 2021. This will be reflected in our Statement of Common Ground	Yes
Environment Agency	Policy GSS01	We support the statement in the policy that infrastructure is key to supporting growth, including investment in transport, education, health and open spaces. However, we'd like to see flood risk, waste water, water supply, and green infrastructure included as part of this statement in the policy. Lack of consistency between GSS01 statement on small sites and the WLA Level 1 SFRA] We recommend you assess where windfall development would be considered acceptable in relation to flood risk in Barnet. A clear position on this helps Development Management teams in their review of planning applications proposed in areas of flood risk, helping to determine whether the Sequential Test requirements are met or not. The Environment Agency can only assist with part (b) of the Exceptions Test, as to whether a site-specific flood risk assessment is acceptable or not.	Reg 19 is supported by the Level 2 SFRA	Yes
Friern Barnet and Whetstone Residents' Association	Policy GSS01	The physical extent of the Opportunity Area should be more precisely identified in the next draft. Depending on that the question of whether the whole of the Area, or just part of it, is potentially suitable for Tall and/or Very tall Buildings will need consideration. Failing that, there is a risk of putting "cart before horse".	New Southgate Opportunity Area is highlighted in the London Plan. The boundaries of the Opportunity Area have not been formally defined but they will cross into LB Enfield and LB Haringey. The Council will be working with the other boroughs and the GLA on creating an area planning framework which will be subject to public consultation. This will provide more detail on appropriate building heights.	No

Taylor Wimpey Strategic Land	Policy GSS01	<p>We note that draft Policy GSS01 sets out that new housing development will be delivered through a number of different components of supply, including growth areas (21,300 homes), district town centres (6,100 homes), existing and major new public transport infrastructure (3,450 homes), estate renewal and infill (4,000 homes), major thoroughfares (4,900 homes) and other large sites including car parks (1,150 homes). In addition to this, it is expected that 5,100 homes will come forward on small sites which are not formally identified. We have a number of concerns with the identified sources of supply which raise doubts as to whether LBB will be able to meet their housing requirement and accord with NPPF para 67 which requires planning policies to “identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability”. The following issues should be explored further and where additional evidence cannot be provided to demonstrate that sites are deliverable or developable within the Plan period, these sites should be removed. 1 It appears that there may be some double counting of housing numbers in relation to the growth areas of Cricklewood town centre and Brent Cross West identified under category 1, whereby the stations in these locations have also been included for housing growth under ‘Existing and major new public transport infrastructure’ (category 3). It is not clear which of the sites proposed to be allocated are included under each of the categories and in some cases how the final totals have been calculated. For example, in Cricklewood, only two sites have been identified for a total of 1,139 homes compared to an allocation in draft Policy GSS01 in Cricklewood Town Centre of 1,400 homes. 2 Some of the infrastructure projects listed, which could facilitate housing growth, are not currently confirmed to come forward. As such the timescales for their delivery which could support increased housing delivery in these locations are unknown and it cannot be guaranteed that these sites will viably come forward within the Plan period. This includes both Crossrail 2 and the West London Orbital. The necessary infrastructure to support increased housing in these locations is therefore not evidenced to support the associated allocations. 3 We would also query the deliverability of the small sites provision included. The policy sets out that the number of houses expected from small sites is based on past trends. Significantly in discussing the small sites policy in the London Plan, the Panel report for the New London Plan placed significant doubt on the reliance of small sites available to deliver housing growth in London. In particular, the Panel report sets out that the New London Plan has failed in considering the huge range of factors that could inhibit deliver such as whether sites are available to come forward, land assembly and bringing sites forward quickly and lack of finance. As a result, the Panel recommended a reduction in small sites housing supply. LBB therefore needs to provide a robust evidence base to support its housing supply coming forward from small sites which relies on more than past trends in order to justify this approach. If this cannot be provided, alternative sites should be identified to meet this requirement. The release of land within the Green Belt (GB) and Metropolitan Open Land (MOL) for housing has not been considered on the basis that the exceptional circumstances do not exist for its release under NPPF paragraph 136. However, as noted above, the Panel report on the New London Plan emphasised that a Strategic Green Belt Review of London should be undertaken as soon as possible, and this would feed into a review of the London Plan. In any event, draft London Plan Policy G3 (Metropolitan Open Land) allows for land to be released from MOL in exceptional circumstances, while the SoS’s letter has proposed the removal of the requirement to ensure that the quantum of MOL land is not reduced. Sites which do not meet the objectives of MOL are therefore suitable to be allocated and can support LBB in meeting their housing requirement. It is considered that there are exceptional circumstances to release the site from the MOL. The land to the east of Colney Hatch Lane is one example of MOL land which is suitable to deliver housing. It is a vacant former ILEA playing field site which does not provide any public benefit in terms of useable public open space and recreation as it is not publicly accessible. It has been assessed against the MOL objectives and the following conclusions can be made: • There is no distinguishable link to the MOL to the west (Powerleague site) and there is no public access through the MOL. • The site</p>	<p>The housing target is now the London Plan target of 35,460. Through the Local Plan we can demonstrate that this target is deliverable</p> <p>The IDP was published in February 2021</p> <p>We refer to previous responses on land at Colney Hatch Lane</p>	No
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		does not provide publicly accessible open space or sports facility. • The site does not contain any feature or landscape of national or metropolitan value or local landscape value. • It does not form part of Barnet's designated Green Chain and would not be able to as it is not publicly accessible and does not include any public footpaths. The Barnet Green Belt and Metropolitan Open Land Study should therefore be reviewed to reassess the boundaries in the context of the housing requirement and the land east of Colney Hatch Lane should be allocated for housing development in the emerging Local Plan.		
Brent Cross South Partnership (DP9)	Policy GSS01	The stated number of residential units in this policy reflect the extant planning permission for Brent Cross Cricklewood, however, the draft London Plan shows an indicative housing capacity for Brent Cross Cricklewood as 9,500 homes. Given the draft London Plan's aspirations for optimising land opportunities and increasing site capacity, we suggest that stated figures allow for optimisation. As noted above, the Zonal Floorspace Schedule within the Development Specification and Framework of the BXC permission specifies c.110,000m2 of retail and related uses site wide (c.78,000m2 North of the A406 and c.32,000m2 South of the A406).	Figure has been changed to be consistent with the London Plan	Yes
Barratt London	Policy GSS01	Broadly support Barnet's approach to its strategic growth objectives and locations and recognition that there will be "other large sites including car parks" coming forward for delivery in addition to the locations identified. West Hendon does form part of Brent Cross and the Estate Renewal and Infill strategic categories. Suggest that the housing targets be expressed as minimums.	Support noted and welcomed. Target figures for new homes are given for each of the 7 areas / categories identified in table 5 and policy GSS01.	No
Barnet CCG	Policy GSS01	This policy and Table 5 and helpfully set out the housing capacity by source / area, for example in Growth Areas. A different pattern of housing growth across the borough will have implications for healthcare infrastructure and may require different approaches to deal with site specific impacts, for example in the six Growth Areas and estate renewal areas and cumulative growth in other areas and on small sites. Understanding the timing of growth is important to identify when investment is needed to provide additional capacity.	Table 5 has been revised	Yes
Clive and Gill Hailey	Policy GSS01	Totally unrealistic and unachievable "targets" being imposed by Central Government and by the Mayor of London in respect of new housing stock, in particular for "affordable" housing - a term that doesn't actually mean anything achievable in most of the affluent areas that comprise the majority of Barnet. Council has to set and stick to a realistic target for the annual number of new units. Summary of possible locations is already scraping the bottom of the barrel in respect of realistic sites that might be made available for housing - some are so poor, small or badly located that the development costs per unit would be untenable. Struggle to identify 67 possible sites with a projection of 16,632 units - far short of the mandated target and in any case, include over 2,000 units already approved.	Not all sites that will deliver housing are included as proposals in the Local Plan. There are also contributions from small sites and through permitted development..	No
Roger Chapman	Policy GSS01	Add new point g) Barnet Wastelands - 1040 – 2600 homes (Policy GSS 14)	The Council refers to its previous response on Barnet Wastelands	No
London Diocesan Fund (Iceni Projects)	Policy GSS01	The Council's current approach to delivering this growth focuses on regenerating and developing areas of brownfield and underused land. The Council are therefore proposing all allocations to be outside the Green Belt or within the built up settlement area, for example seeking to deliver 21,300 homes in 6 Growth Areas across the Borough. Whilst we generally support this approach as a starting point, in its current form it will not ensure that enough housing is delivered in Barnet. As will be explored throughout, releasing Green Belt land will be necessary to; meet housing needs; deliver necessary infrastructure such as schools; and increase affordability while maximising development on brownfield land within the built up settlement area.	The Council refers to previous responses justifying the continued protection of the Green Belt and MOL	No
London Diocesan Fund (Iceni Projects)	Policy GSS01	Brent Cross is Barnet's largest and most significant area of regeneration, identified as an Opportunity Area in the London Plan. This is a large and complex scheme, taking over 20 years to deliver 7,500 homes. The Council highlights that outline planning permission, originally approved in 2010, is now nearly a decade old. While it has flexibility to allow the phasing and delivery sequence of the development to be adjusted, it is expected that it will need to be supplemented through further planning	The Council reviews its housing trajectory on an annual basis. Barnet's second Housing Delivery Action Plan has been published. We refer to previous responses with regard to Green Belt release.	No

		applications to update areas of the masterplan as it evolves and as the development responds to updated market and policy shifts. The Council are yet to publish a housing trajectory; however we anticipate the delivery of the growth areas to be focused or even beyond the plan period. The Council will therefore need to look to allocate additional land to be delivered in the short term and ensure schemes are built out at a rate that accords with the Housing Delivery Test. Barnet achieved 90% of their housing delivery from 2016-2019 and is required to prepare an Action Plan for how the Council plan on increasing their delivery rates. This further supports the argument that the Council will need to increase their delivery and build a buffer rather than expecting these sites to come forward as planned. We consider that Green Belt sites can be brought forward quickly and help meet need in the early part of the Plan Period without the need to rely upon new infrastructure.		
Lansdown	Policy GSS01	Policy GSS01 is both clear and positive in setting out the key priority to ensure development and growth will be achieved sustainably. However, similarly to the previous comments, the exclusion of any green field / Green Belt land from consideration seems problematic. Alternative Option 2, which includes such land in determining the housing target to set, would be more beneficial in meeting the OAN and overcoming the problems that the lower 46,000 homes target may cause. So long as the overarching 'sustainability' target is met, green field / Green Belt land should be considered and reviewed in greater detail than is the case with the current draft. This will increase the housing land supply to meet OAN and still ensure that sustainable areas are developed, with only Green Belt land release causing least harm to the environment being allowed.	The Green Belt study was carried out in accordance with the NPPF and within the framework provided by the London Plan. The draft Local Plan demonstrates how Barnet will accommodate growth through Policies BSS01 and GSS01. As such, the review does not support making the case needed to demonstrate that exceptional circumstances exist sufficiently to justify making revisions to the existing Green Belt and MOL boundaries. Barnet's Green Belt Study will help inform any future London wide review led by the Mayor. Any revisions to Green Belt / MOL made through the next review of the London Plan will be reflected in the Local Plan after this.	No
LB Barnet Estates	Policy GSS01	as currently drafted does not acknowledge contribution of Hendon Regeneration Project in meeting sustainable growth objectives and request that the following paragraph is inserted after (f): <i>"The Hendon Regeneration Project will see the redevelopment of existing Middlesex University and Council owned land and other sites to include; up to 1,405 gross student bedspaces, up to 8,685 gross sqm of University teaching floorspace, up to 465 gross sqm of library floorspace, 190 gross sqm of community floorspace, 345 gross sqm of retail floorspace. Where the need arises to secure economic and social benefits a Compulsory Purchase Order(s) will be made in order to assemble land uses in the public interest."</i>	The Hendon project contributes to Barnet's Sustainable Growth. This is now reflected in GSS01 and supporting text, providing a strategic hook for the Middlesex University and the Burroughs SPD as well as Local Plan site proposals.	Yes
Elizabeth Silver	Policy GSS01	Sustainable growth can only be achieved if: 1 Infrastructure is planned in advance of house-building plans. 2. Resources and plans must be in place in advance e.g. for water supply, sewage and Healthcare. These must not be funded from Community Infrastructure Levies or S106 agreements. 3. We should take account of projected water shortages in the South East <a href="https://www.standard.co.uk/news/uk/london-and-southeast-face-major-water-shortages-by-2050-environment-agency-warns-a3846226.html">https://www.standard.co.uk/news/uk/london-and-southeast-face-major-water-shortages-by-2050-environment-agency-warns-a3846226.html</a> 4. Not all spaces available are built on for housing, so that some room for expansion is available in the future, or possibly there may be decreases in requirements due to lower fertility, or young families moving out of London.	The Reg 19 Local Plan is supported by the Infrastructure Delivery Plan (IDP) which provides an assessment of current infrastructure provision, future needs, gaps and deficits, along with an indication of costs of providing infrastructure.	No
Geoffrey Silver	Policy GSS01	Para 1 says "infrastructure is key to supporting growth", which is fine if provided in advance, but at Mill Hill East where developments are in full flow, infrastructure needs to catch up, e.g. Mill Hill East trains are often full in the morning rush hour, and Mill Hill GP surgeries are very stretched.	The Infrastructure Delivery Plan (IDP) has been published. The IDP will provide an assessment of current infrastructure provision, future needs, gaps and deficits, along with an indication of costs of providing infrastructure.	No

Land owner 360-366 Burnt Oak Broadway	Policy GSS01	We support the new homes targets identified for Edgware Town Centre (5,000 homes) and Major Thoroughfares (4,900 homes) in particular. These locations (particularly the A5/Edgware Road) offer significant capacity to accommodate new housing development as part of a managed process of change, for which policy support will be key to ensure delivery. We also firmly support the target of accommodating 5,100 homes on sites which have not been formally identified. This will help improve the deliverability of suitable (but currently) unknown windfall sites over the plan period by establishing a supportive policy position, which will be key to delivering sufficient housing to meet the Borough's assessed housing needs. We note the total indicative units in the Schedule of Site Proposals is 16,632, as such it will be critical for sites not already identified as coming forward for residential development to contribute to meeting these targets. This is underpinned by the small sites evidence set out in the London SHLAA.	The Local Plan small sites figure is further supported by changes to Policy CDH01 on Promoting High Quality Design	No
Mill Hill Missionaries	Policy GSS01	The Local Plan should identify alternative sites that can contribute towards meeting not just Barnet's objectively-assessed need, but also the high level of unmet need across the wider London area (circa 140,000 homes).	Barnet has been set a minimum housing target of 35,460 new homes through the London Plan and a OAN of 46,000 new homes	No
Finchley Society	Policy GSS01	Para 4. Rework - there are grave doubts whether Cross Rail 2 will go ahead in the plan period; the West Orbital must also be very uncertain.	These infrastructure projects are programmed transport schemes in London Plan Table 10.1. London Plan Policy T3C states that these schemes should be appropriately safeguarded and so therefore are highlighted in the Local Plan.	No
Ropemaker Properties	Policy GSS01 & GSS09	No land allocated around Hendon station to provide planned 950 homes.	As part of the Call for Sites exercise there was an opportunity for landowners to promote such sites especially as the West London Orbital link had been given the go-ahead. The allocation of new homes due to the WLO is based on greater potential for site intensification due to increased PTALs	No
Environment Agency	Policy GSS02	We recommend you assess where windfall development would be considered acceptable in relation to flood risk in Barnet. A clear position on this helps Development Management teams in their review of planning applications proposed in areas of flood risk, helping to determine whether the Sequential Test requirements are met or not. The Environment Agency can only assist with part (b) of the Exceptions Test, as to whether a site-specific flood risk assessment is acceptable or not. Some fluvial flood risk from River Brent and surface water flood risk including the Hendon Way Critical Drainage Area (CDA) within this Growth Area. We recommend there is acknowledgement of this within the policy with an overall aim to reduce and manage the risk of flooding from all sources.	Agreed. Revision made	Yes
Highways England	Policy GSS02	States under 'Transport Improvements': "Development proposals will need to bring forward the following through detailed design, planning conditions and/ or Section 106 agreements:... Connections and/ or improvements to the strategic road network, that are supported by Transport for London in relation to the TLRN (TfL Road Network), and the Highways Agency in relation to the M1 motorway, based on up to date mode share targets". Highways England must be consulted with respect to any development proposals that have the potential to impact the SRN, in this case the M1. With reference to Policy GSS02, the wording should be updated to refer to Highways England, in place of the Highways Agency.	Agreed. Revision made	Yes
Brent Cross South Partnership (DP9)	Policy GSS02	Reflecting comments above to allow for optimisation of sites and to ensure the consistent use of floorspace references (namely, with regard to the Zonal Floorspace Schedule within the Development Specification and Framework specifies c.110,000m2 of retail and related uses site wide (c.78,000m2 North of the A406 and c.32,000m2 South of the A406)).	Figures reflect the planning consent	No
TfL	Policy GSS02	We welcome the Council's commitment to delivering Healthy Streets in the Brent Cross growth area. Improvements to Brent Cross station are an integral part of facilitating this growth. We would expect to see a reference to delivering capacity enhancement and step-free access to Brent Cross station as part	Agreed	Yes

		of new development in the area. When significant time has passed since transport assessments for development that has not yet commenced, they should be revisited to reflect the latest proposals for Brent Cross station and the current status of transport services in the area. Current assumptions are that public transport use will be higher in future than predicted when the commitment to provide step-free access to Brent Cross station was made by the developer. There is ongoing work to update the models by Argent Related, which the Council could use to test how they submit Good Growth outcome before the local plan is finalised.	
Brent Cross Dev Partners	Policy GSS02	<p>The Draft Local Plan proposes individual Growth Areas in the Local Plan for the Brent Cross Growth Area which includes “Brent Cross North”, “Brent Cross South” and “Brent Cross Thameslink”. These areas are identified on ‘Map 3: Brent Cross regeneration map’ on page 38. As the development north of the A406 is known as Brent Cross London, the DPs request that any reference to “Brent Cross North” is replaced with “Brent Cross London” throughout the document as per the map key. The DPs have several concerns with Map 3. Firstly, the map is not clear and it should be of better quality so it is clearly legible. Secondly, the triangle plots should be identified as being within Brent Cross South as they are to be delivered by LBB and their development partner Argent/Related. The map should be updated as detailed or deleted. Para 4.12.4 identifies that the Brent Cross Growth Area, especially Brent Cross London, will continue to represent an appropriate location to focus retail and related leisure and entertainment activities and it is important that development around Brent Cross Shopping Centre primarily supports the creation of a destination attraction including a range of uses contributing to the night time economy. The DPs welcome this support. Draft Policy GSS02 is concerned with ‘Brent Cross Growth Area’ . The DPs are supportive of the proposed allocation of Brent Cross as a Growth Area and the approach to provide a range of uses within this location. The supporting text at Para 4.13.1 notes that the Brent Cross regeneration will need to deal with changes in economic and market conditions over a long period of time, and that the outline planning permission is now nearly a decade old. Draft Local Plan states that whilst the outline planning permission has limited amount of flexibility to allow the phasing and delivery sequence of the development to be adjusted, it is expected that: <i>“it will need to be supplemented through further planning applications to update areas of the masterplan as it is evolved and as the development responds to updated market and policy shifts.”</i> The Council identify that to enable this, the approach is to create a policy framework for the Brent Cross Growth Area capable of responding to change in the long-term. As such Draft Policy GSS02 includes a section regarding the progress of Brent Cross which notes that the introduction of a new planning framework may be required. Given the current economic uncertainty, particularly within the retail sector, the DPs support the approach to further planning applications being submitted to update areas to the masterplan in order to respond to wider changes. However, the DPs do not consider there is a need for a further planning framework given the detailed criteria in the draft policy that development proposals must address. Draft Policy GSS02 states that development proposals within the Growth Area must comply with a number of requirements including that they must “demonstrate how they achieve comprehensive development of the area.” The DPs are of the opinion that the wording of this requirement as currently drafted is too restrictive and could potentially inhibit sustainable development from coming forward. BXC regeneration is a large and complex scheme that will take over 20 years to deliver and as such, there are potential opportunities for temporary uses to be delivered on areas of the site before they are required for redevelopment. Whilst appropriate temporary uses would enhance and revitalise the area, they may not necessarily be capable of meeting the requirements of the policy wording as currently drafted. We would therefore suggest that the text is revised as follows: “Demonstrate how they assist in achieving comprehensive development of the area, with temporary and meanwhile uses encouraged”. The draft policy states that development proposals within the Growth Area must “protect and improve the amenities of existing and new residents”. The DPs request that the wording of this part of the policy is</p>	<p>The Council welcomes this support. Map 3 has been replaced by new maps showing the boundaries of all Growth Areas / Opportunity Areas. The Council does not consider that the wording will deter sustainable development. A future planning framework remains as a valid option whilst development remains at an early stage.</p>
			Yes .

		re-considered. Whilst the protection of residential amenity is supported, in some instances, it would not be possible for development proposals to improve amenity. We would therefore suggest that the wording is revised to include 'where possible' as follows: "Protect and where possible improve the amenities of existing and new residents"		
Finchley Society	Policy GSS02	How can the new Brent Cross town centre be 'green, safe and welcoming to all' with the North Circular running through it, even if there is a mass take-up of almost silent electric cars? Pedestrian bridges over the North Circular should be enclosed to remove the impact of the noise, poor air quality, safety etc. of the road on those crossing it. The Council must bear in mind the needs of the less able and not just the disabled in its design of pedestrian access. While a long and winding slope may suit those in a wheelchair, it does not support those with mobility issues using walking sticks and tri-walker type support, who then have to walk much further.	The design of pedestrian bridges, in particular with regard to accessibility, is best addressed at the planning application stage.	No
Barnet CCG	Policy GSS02	Supports policy stating that development proposals within Brent Cross Growth Area must provide sufficient community infrastructure, including new and expanded schools and primary healthcare capacity. Brent Cross West Growth Area is a new growth opportunity supported by the new Thameslink station. Healthcare capacity provided in Brent Cross South should therefore consider the impact of 1,800 additional homes in Brent Cross West. The CCG welcomes the opportunity to contribute to a Supplementary Planning Document for Brent Cross West.	This support is welcomed	No
Finchley Society	Policy GSS02 & Para 4.13.3	Look forward to seeing and commenting on the indicators and milestones Barnet is developing to monitor progress on the Brent Cross Growth Area. It is essential that developers contribute towards the cost of delivering infrastructure to support new housing, retail, industrial and office space. The policy should cover water and sewage supply and refuse removal from domestic and commercial sites, as well as schools, primary care and various leisure facilities.	Agreed that developers contribute towards the cost of delivering infrastructure to support new housing, These indicators and milestones form part of the Reg 19 document	Yes
Wade Miller-Knight	Policy GSS03	Supportive of night-time use leisure facilities, with suggestion to plan for the night use activities to be along an axis next to the new Brent Cross West station to the current shopping mall. Visual and physical continuity of a covered pedestrian link would be important for movement and encourage use.	A framework for the Brent Cross West area will be prepared which will outline such detail	No
Environment Agency	Policy GSS03	Some fluvial flood risk from the River Brent and surface water flood risk including the Claremont Way Industrial Estate Critical Drainage Area (CDA) within this Growth Area. We recommend there is acknowledgement of this within the policy with an overall aim to reduce and manage the risk of flooding from all sources. Growth and Spatial Strategy GSS03 In addition, there are opportunities to restore and enhance River Brent along the section associated with the Brent Cross West Growth Area, for example, through Kingsbury Park. A similar policy criteria to GSS02 should be added to acknowledge the potential for restoration and enhancement of the River Brent and it's corridor to provide amenity and biodiversity benefits for the area.	Agreed	Yes
LB Brent	Policy GSS03	The Council supports the policy framework that seeks a more 'joined up' approach between the two boroughs and other stakeholders to ensure a more comprehensive development occurs. This will maximise the efficiency of the regeneration of the area, taking account of the opportunities that the improvements to public transport can provide in its attractiveness to inward investment that enhances its place-making characteristics. The Council welcomes the approach that seeks to ensure appropriate social and physical infrastructure is provided to support a new community and that areas/ developments within the respective boroughs make a proportionate contribution to their provision. Whilst some preliminary work has been started in with regards to Staples Corner SIL with the GLA, which LB Barnet are also contributing towards, there could perhaps be a greater clarity on the extent to which LB Barnet will seek to work with LB Brent in adopting a more co-ordinated approach to joint planning for the area. Suggested modification as in other LB Barnet's draft Local Plan Growth Area Policy GSS03: "...The Council will seek to prepare a more detailed planning framework for this area, such as through	Agreed This will be reflected in our Statement of Common Ground	Yes



		an Area Action Plan or a Supplementary Planning Document, potentially ideally through joint working with LB Brent.”		
Mayor of London	Policy GSS03	Useful to show this area on a map as not shown on Map 3 for Brent Cross regeneration	Agreed – Map 3 revised. New maps to show clearer boundaries for Growth Areas with Local Plan proposals sites clearly marked.	Yes
TfL	Policy GSS03 GSS04	We request that the Council add specific reference to supporting development proposals that facilitate access to and delivery of the West London Orbital. We also request that the Council provide clarity on the number of new homes expected to be unlocked in Barnet as part of the scheme. TfL will continue to work with the Council to update this assessment. We welcome that the Council will request contributions towards both new and improved active travel routes to Brent Cross West station, as well as improved interchange, onward travel facilities and public realm outside the station. We ask that the Council include potential contributions toward delivery of the West London Orbital scheme itself in this list. Similarly, we ask that the Council request contributions towards new/improved active travel routes to Cricklewood station, as well as improved interchange, onward travel facilities and public realm outside Cricklewood station.	Agreed. Revisions made in support of West London Orbital, Brent Cross West and Cricklewood Stations. Clarification provided on new homes expected as a result of the WLO.	Yes
Friends of Finchley Way Open Space	Policy GSS03	Strongly support the assertion that residential development should be away from the major road junctions.	This support is welcomed	No
Environment Agency	Policy GSS04	Surface water flood risk is prevalent in this area, along with two or possibly three CDAs (Brent Terrace and Lichfield Road). We recommend there is acknowledgement of this within the policy with an overall aim to reduce and manage the risk of flooding from all sources.	Agreed	Yes
Leila Ager	Policy GSS04	Object to building 1,400 homes due to current poor air quality and traffic problems that already exist.	The Local Plan has identified Cricklewood Town Centre as a Growth Area supporting proposals that optimise densities while improving the overall offer of the town centre.	No
Railway Terraces Residents Association	Policy GSS04 & CDH04	Intensification of development in Cricklewood is not appropriate with development no higher than 10 storeys. B&Q proposals overdeveloping site and should be stepped down as they approach Railways Terraces Conservation Area.	The Local Plan has identified Cricklewood Town Centre as a Growth Area supporting proposals that optimise densities while improving the overall offer of the town centre.	No
Environment Agency	Policy GSS05	We recommend the policy aims to reduce and manage the risk of flooding from all sources, promote sustainable drainage measures and the potential for planning contributions to be sought for the maintenance and upgrade of flood storage areas. We have also identified a number of river restoration and enhancement opportunities for the Edgware Brook, Deans Brook and Silk Stream main rivers. These will improve water quality and biodiversity as well as potentially providing better access and amenity to the rivers. GSS05 should acknowledge the potential for this growth area to contribute to the achievement of river restoration and enhancement for the benefit of flood risk, water quality, biodiversity and amenity for residents.	Agreed	Yes
Land owner at 360-366 Burnt Oak Broadway,	Policy GSS05	We support the designation of Edgware Town Centre as a Growth Area, noting that this is fully aligned with strategic London Plan policies that seek to direct growth to town centres and other areas of good public transport accessibility. The boundary of the growth area should be clearly defined within the Policies Map. We note that the area that immediately surrounds the town centre also offers significant capacity for redevelopment (particularly for housing), therefore we recommend that the boundary of the Growth Area should extend beyond the defined Town Centre Boundary to include edge-of-centre locations (i.e. 300m from the defined boundary as per the NPPF definition). As the location of town centre uses should follow the sequential approach and be directed towards town centre sites, this results in greater potential capacity of edge-of-centre for higher density housing in support of the overall Growth Area objectives. We recognise the importance of retaining employment levels within the	Boundaries for Edgware Growth Area as shown in Reg 19 have been initially established through the Edgware Growth Area SPD. It is important that Growth Areas as a minimum retain existing levels of employment. Policy ECY01 outlines preferred locations for new employment growth. This includes town centres for offices. Policy ECY01 (i) sets out how the Local Plan will consider proposals on non designated employment land. This includes uses such as garages.	Yes

		Edgware Growth Area, however we believe employment should be retained in, and directed appropriately towards, town centres and distinction between the approach to employment retention within town centres and edge-of-centre sites should be made within policy.		
Roger Tichborne	Policy GSS05	Concerned about growth plans and lack of supporting infrastructure provision, including tube capacity, amenities and health services.	Edgware SPD provides greater detail on the plans for growth and infrastructure as well as the IDP.	No
Barnet CCG	Policy GSS05	Noting that potential new housing capacity in Edgware Town Centre has increased to 5,000 homes the CCG would welcome the opportunity to contribute to a detailed planning framework for this area.	We welcome the CCG's input to the Edgware SPD and any subsequent detailed planning frameworks for the area.	No
LB Harrow	Policy GSS05	Further south from Edgware Town Centre is Burnt Oak, which is classified as a District Centre. This centre sits across the three administrative boundaries of LB Harrow, Barnet and Brent. The LB Barnet draft Local Plan seeks to support development in town centres such as Burnt Oak, through policy GSS08 (Barnet's District Town Centres) as such locations are more sustainable. LB Harrow supports the inclusion of such a policy, and the principle of development in sustainable locations. Accordingly, LB Harrow agree that the alternative options would not be in the interests of sustainable development. However, LB Harrow would wish to have further dialogue of development density within Burnt Oak, as there should be a holistic approach across the town centre regardless of administrative boundaries. This should take into account development heights and public realm aspirations for example. Following on from the strategic policies noted above for both Edgware Town Centre and Burnt Oak District Town Centre, LB Harrow supports the accompanying 'generic' town centre policies for these areas; listed as TOW01 (Vibrant Town Centres) and Policy TOW02 (development Principles in Barnet's Town Centres, Local Centres and Parades.	The Council welcomes this support from LB Harrow. We will ensure cross-borough working on proposals affecting Burnt Oak. This will be reflected in our Statement of Common Ground.	No
Aberdeen Standard Investments	Policy GSS05	To assist in realising the growth propose amending the text: " <b>a minimum</b> of 5,000 new homes"	The housing figure shows what the Council is seeking, dependent on specific proposals coming forward. To set the 5,000 figure as a minimum is not appropriate.	No
TfL	Policy GSS05	TfL would welcome continued engagement with the Council on developing a Supplementary Planning Document to help unlock the growth potential of Edgware town centre. We strongly support the Council's ambition to improve transport interchanges and the public realm in Edgware through new development. This policy should set out more clearly what will be expected from development proposals in and around the town centre in terms of contributing towards these improvements, for example provision of additional town centre cycle parking, station cycle parking, and Healthy Streets improvements. We are open to reviewing the 'relationship between the rail and bus stations and the wider town centre' and support greater integration of the town centre with Edgware station and Edgware bus station. However, we would question the emphasis on the stations' role in congestion without reference to reducing incentives to drive. Improving public transport alternatives will also be important for reducing congestion, including through bus priority and protecting land used for transport, including bus garages and railway stabling. We would welcome further discussions with the Council on how the use of the bus and rail station land can be optimised to unlock growth in Edgware and beyond while maintaining the vital functions they carry out. Regeneration of the town centre that involves transport land consolidations should focus first on reducing inefficient uses of land, such as car parking. TfL will strongly support a car-free approach to growth and regeneration in the town centre.	Welcome these comments	No
Middlesex University	Policy GSS06	Additional bullet point under " <i>Colindale development up to 2036 will be focused in the following locations: Middlesex University's Platt Hall and Writtle House site will be redeveloped to provide approximately 1,500 units of student accommodation together with associated facilities and improved integration with the wider area.</i> "	Agreed	Yes
LB Brent	Policy GSS06	With regards to the Growth Area/ Opportunity Area boundary, if its proposed boundary is beyond that identified in the key diagram and more aligned to that shown in the London Plan, it would be helpful for	Agree. New maps have been added to the Reg 19 to clarify the boundaries of the Colindale Opportunity	Yes

		<p>the Barnet Plan to indicate the link with Brent and the potential need to work in a more collaborative manner. LB Brent's draft Local Plan recognises in para 5.3.48 that '<i>As the majority of the Opportunity Area's development will occur in the London Borough of Barnet, the council will have to work closely with it, particularly in relation to development along the A5 Edgware Road to ensure its successful implementation</i>'. A similar recognition in the Barnet Local Plan would clarify the potential for future mutual engagement. It is also unclear of the extent to which the documents identified in para 4.17.9 will continue to inform the development of the area, or whether the policy in the draft Local Plan is a precursor to a wider refresh of existing development plan documents/ supplementary planning advice. If new supporting documents are likely to be produced, LB Brent would be particularly interested in being engaged in their production for those areas along or in close proximity to the borough boundary. If it is the intention for new supplementary documents to be developed, for this to be identified in the policy and working with LB Brent where appropriate.</p>	<p>Area and additional text has been added to ensure close engagement with LB Brent.</p> <p>The Council will ensure that LB Brent are informed of any intention in future to produce new area planning frameworks affecting Colindale. This will be reflected in our Statement of Common Ground.</p>	
Environment Agency	Policy GSS06	<p>We support the policy intention for improvements to open spaces which enhance the amenity and biodiversity at Colindale, Montrose, Rushgrove and Silk Stream Parks. We have identified a number of river restoration measures to the Silk Stream main river to enhance biodiversity such as removal of wooden toe-boarding, removal of concrete bed and banks, removal of weirs and fish easement at weirs in the Silk Stream, Montrose and Rushgrove Parks. Improvements to the Silk Stream river should be explicitly mentioned within this policy measure, to ensure these opportunities are visible alongside the improvements to the open spaces themselves. The wording should be amended (see additions in red text) as follows:</p> <p>Improvements to open spaces and the Silk Stream river which enhances the amenity, biodiversity and makes provision for play space, including at Colindale, Montrose, Rushgrove and Silkstream Parks...The preamble supporting text (4.17.1-4.7.11) should include reference to the river restoration opportunities applicable to these parks, as summarised above. We would also support the following policy criteria in relation to the Public Health England site, with the following amendment to ensure opportunities to enhance biodiversity are also maximised in relation to the aim to reconnect the area with the Silk Stream main river: The Public Health England site where residential led development will re-integrate this site back into Colindale and reconnect the area with the Silk Stream, with enhancements for biodiversity complimenting the riverside location. We are currently working on a new Silk Stream Flood Alleviation Scheme intended to protect areas in Colindale and Rushgrove Park from flood risk. This is likely to require partnership funding contributions to be viable, and it's possible that planning contributions to this scheme may be sought, where appropriate.</p> <p>We strongly recommend the policy acknowledge the flood risks with an overall aim to reduce and manage the risk of flooding from all sources. The potential for planning contributions to be sought towards the Silk Stream Flood Alleviation Scheme and implementation of Sustainable Drainage Systems, should also be included in the policy.</p>	<p>Agreed – Text and policy revised</p> <p>Several river restoration measures have been identified to enhance biodiversity of the Silk Stream main river such as removal of wooden toe-boarding, removal of concrete bed and banks, removal of weirs and fish easement at weirs in the Silk Stream, Montrose and Rushgrove Parks. These projects should occur alongside improvements to the open spaces themselves.</p> <p>The Public Health England site where residential led development will re-integrate this site back into Colindale and reconnect the area with the Silk Stream, with enhancements for biodiversity complimenting the riverside location.</p>	Yes
Home Group	Policy GSS06	<p>Add the following The regeneration of the Douglas Bader Park Estate, including the re-provision of existing affordable houses and flats.</p>	<p>Agreed – Ensure reference is made to Site 10 in GSS06 and supporting text</p>	Yes
LB Brent	Policy GSS06	<p>Colindale town centre falls within LB Brent and LB Barnet. Burnt Oak town centre is identified as a priority town centre elsewhere in the preferred options document. There however is limited mention of Colindale town centre. This is one of Brent's priority town centres. Given Colindale town centre's proximity to the Colindale growth area, the Council feels that the opportunity has been missed to make a specific link between the growth area and the role it will play in supporting the town centre and vice-versa. It would like to see the Barnet Plan be more explicit about this relationship. The draft Barnet Local Plan identifies a list of deliveries for the growth area in addition to new homes delivery. However it could also, like LB Brent's Local Plan <i>Policy BP3 North</i>, include measures in relation to Colindale town centre of enhancing character, identity and its heritage assets. Policy GSS06 and supporting text to be</p>	<p>Agreed. Colindale – The Hyde Town Centre and Burnt Oak have an important part to play in the success of the area. GSS06 and supporting text has been revised to reflect this, including reference to coordinating with LB Brent. This will be reflected in our Statement of Common Ground.</p>	Yes

		more explicit about the relationship between the growth area and the town centre and the potential to address matters that would assist in improving the vitality and viability of that town centre..		
TfL	Policy GSS06	We support the Council's ambition to improve connectivity and reduce severance where possible. We strongly urge the Council to engage with TfL at the earliest opportunity regarding provision of a new walking and cycle route under the Northern line to ensure that any potential impacts on the railway are minimised, mitigated and managed. We would welcome more detailed policy wording that sets out that all development within walking distance of Colindale station will be expected to contribute towards station improvements, potentially including but not limited to delivery of step-free access and capacity enhancement, and provision of additional cycle parking. New development in Colindale should deliver improvements to streets and the public realm in line with the Healthy Streets Approach. We strongly support the Council's aim to deliver 'ongoing improvements to bus services' through new development. We urge the Council to be more explicit in what these improvements could look like and suggest including an expectation that new development will contribute towards bus priority improvements at junctions, provision of bus lanes along bus corridors, service frequency improvements, and/or supporting infrastructure including bus stations, bus garages and/or bus stands. This is to ensure that growth makes a positive contribution both to mitigating its own transport impacts and to enabling wider mode shift to sustainable travel. We strongly welcome implementing on-street parking restrictions through a Controlled Parking Zone (CPZ) and are happy to work with the Council to implement this where appropriate.	The Council has revised GSS06 to clarify that contributions from development will be expected to support infrastructure improvements. More details of such improvements are set out in the IDP.	Yes
LB Harrow	Policy GSS06	Burnt Oak town centre is within the boundary of the Burnt Oak and Colindale Opportunity Area. The Colindale / Burnt Oak Opportunity Area (located in Barnet) is currently under review within the new draft London Plan (2019) (Intend to Publish Version). It sets aside an indicative employment capacity of 2,000 jobs and also the minimum delivery of 7,000 new homes. The Burnt Oak district centre is located across the administrative boundaries of the London Boroughs of Barnet, Brent and Harrow. The district centre of Burnt Oak is split by Burnt Oak Broadway (A5), with a portion located within Harrow. LB Harrow would welcome the opportunity to hold further discussions with LB Barnet in relation to how development would be delivered cross administrative borders, to ensure the success of the wider district centre.	The Council will ensure cross-borough working on proposals affecting Burnt Oak. This will be reflected in our Statement of Common Ground.	No
Redrow Homes	Policy GSS06	Should be made clear that delivery is dependent on compliance with other emerging policies and site specific considerations. Stage 3 of Colindale Gardens/Former Peel Centre should also be included in it's contribution of 1,200 homes to Colindale's growth	The Integrated Impact Assessment has considered policy compliance across the Plan	No
Environment Agency	Policy GSS07	Mill Hill East has areas of risk of flooding from surface water. There is a Critical Drainage Areas identified for this area at Bittacy Park. We recommend the policy acknowledge the flood risk from surface water with an overall aim to reduce and manage this risk with Sustainable Drainage Systems.	Agreed – Text revised	Yes
Mayor of London	Policy GSS07	Should make explicit that green belt must not be developed unless previously developed land.	Agreed – GSS07 revised	Yes
Mill Hill Preservation Society	Policy GSS07	Error in calculation of 745 homes – should be 471	Agreed. Numbers have been corrected.	Yes
Geoffrey Silver	Policy GSS07	says "council will positively consider proposals at Watch Tower House and IBSA House", but the recent IBSA proposal includes blocks that tower over the adjacent Millbrook Park houses, and the Watch Tower House proposal is in strongly protected Green Belt in which any increase in built footprint is destructive of the Green Belt essential characteristics of openness and permanence (NPPF 133).	Any future development proposals for this site will be required to carefully consider its suburban semi-rural character, the Green Belt and Conservation Area status in line with the relevant policies contained within the plan	No
Victor Montefiore	Policy GSS07	It is simply not good enough to tack on to the end of the Policy GSS07 Mill Hill East " <i>Any development proposal must consider the Mill Hill Conservation Area and Green Belt designations.</i> " because it means	Any future development proposals that come forward for this site will be considered in accordance with NPPF paragraph 133 to 147. The NPPF states that	No

		that that all of the figures for 'Indicative residential capacity' cascading through several polices are simply undeliverable	redevelopment on Green Belt is not inappropriate where the proposal would not have a greater impact on the openness of the Green Belt than existing development or would not cause "substantial harm" to the openness of the Green Belt, where the development would re-use previously developed and would contribute to "meeting an identified affordable housing need within the area of the local planning authority" (para 145).	
Wade Miller-Knight	Policy GSS07	Propose the exploration of feasibility of developing a public transport link between Mill Hill Thameslink and Finchley Central and further extension west (Edgware) to east. Is there possibility of West London Orbital continuing to Mill Hill Broadway.	TfL have no plans to fund such work. WLO is an important project for improving orbital travel. Any extension of service would need to be linked to growth around Mill Hill Broadway.	No
Friends of Finchley Way Open Space	Policy GSS07	It is important that all new developments in the Mill Hill East/Mill Hill Village (a Conservation Area) area are cognisant of the proximity of the Green Belt, other open land and the more rural character of and history of the area. The development of the army barracks site has already scarred the sightlines west from West Finchley. This development also impacts on the demand for services in West Finchley and Finchley Central. These impacts do not appear to be catered for. The topography and the very limited public transport to the top of The Ridgeway in Mill Hill Village dictate that residential development is on a scale suitable for the available public transport options. Otherwise development, besides fundamentally changing the nature of the area, will generate car ownership resulting in significant congestion affecting all the surrounding areas. The army barracks and the NIMR sites have been developed and are being developed further. Watchtower House and IBSN House are proposed sites for development. Northern Line trains run to Mill Hill East station outside of the rush hour only as a 15 minute shuttle service from Finchley Central and there is only one bus route to the top of the hill (the 240). Public transport into central London is in danger of failing without significant improvements to the Northern Line, especially with the planned development at Finchley Central and High Barnet stations. Allowing such intensive developments which do not allow residents to own cars and not improving the underground and bus services in the area is negligent in the extreme. This would affect not only the borough of Barnet but also the inner boroughs through which the Northern Line passes.	Growth within the Mill Hill East area will support improvements to public transport. Policy GSS07 has been revised to outline more specific improvements.	Yes
Zizer London	Policy GSS07	In addition to the above, the housing figures referred to in Policy GSS07 'Mill Hill East' and its supporting text should be updated to reflect the proposed capacity of the site.	Numbers have been corrected.	Yes
Marsfield	Policy GSS07	We support the designation of Mill Hill East as a Growth Area, noting that this is fully aligned with strategic London Plan policies. Furthermore, we strongly support the inclusion of the Watchtower House site within the wording of the policy. The boundary of the growth area should be clearly defined within the Policies Map.	Reg 19 shows boundaries of all Growth Areas including Mill Hill East	Yes
Former MHNF	Policy GSS07	Sites 46, 47 & 49 are covered under the section on Mill Hill East (GSS07) and we wonder where the 1400 homes you have allocated in the new growth area will be delivered. We can see maybe 1050 in total leaving a deficit of 350. Please advise.	The additional homes will be from the consented developments highlighted in the housing trajectory.	No
Elizabeth Silver	Policy GSS07	Watchtower House and IBSA house are in Green Belt (see NPPF para 143-147). Development here does not pass tests set out in NPPF Para 136 demonstrating exceptional circumstances. Maximising access could mean improvements in public transport where needed, some wheelchair access, litter collection, landscape maintenance and supervised toilets. Cafes should be limited in number as they encourage unhealthy snacks, car travel and parking.	See response to Roger Tichborne  The Watchtower House site was previously identified as a Major Development site within the Green Belt in the 2006 Unitary Development Plan (UDP) due to its existing uses and were considered suitable for redevelopment and/ or infilling. Any future development proposals that come forward for this site	No

			will be considered in accordance with NPPF paras 133 to 147	
TfL	Policy GSS07	An assessment of the impact of further large-scale development around Mill Hill East station needs to be carried out. This station has particularly limited capacity at its gates and staircases. This has been reflected to a degree in Policy GSS09, but including a specific reference in the policy on Mill Hill East would give greater support to the need to assess the impact of cumulative development around the station.	This has been clarified by a revision to GSS07	Yes
Finchley Society	Policy GSS07 & Para 4.18	The transport and traffic consequences of all the Mill Hill developments need admitting and solving. Include a para about this. Unless development is on a scale suitable for the available public transport options it will, besides fundamentally changing the nature of the area, generate car use and significant congestion affecting West Finchley and Finchley Central. Northern Line trains run to Mill Hill East station outside rush hour only as a 15 min shuttle service and there is only one bus route to the top of the hill. Public transport into central London is in danger of failing without significant improvements to the Northern Line; this would affect also other parts of Barnet and the inner boroughs through which the line passes.	Policy and supporting text have been revised to be more specific about transport improvements.	Yes
Redrow Homes	Policy GSS08	Recommend review of all TC and edge of centre sites to ensure parking controls are in place to ensure this isn't a reason for refusal. Applications could include contributions towards CPZs. Part b should also note increase of height to optimise density.	Barnet's car parking study provides a robust justification to parking standards that respond to local circumstances. Increasing density is not always dependent on raising height, as noted in the Tall Buildings evidence base and London Plan (Policy D3 and supporting text).	No
TfL CD	Policy GSS08	Suggest that there is a requirement for development to " <b><u>Support active travel modes and the Healthy Streets Approach</u></b> ". Consider extending the town centre boundary for Chipping Barnet) to include High Barnet Station as there are clear transport and interchange links.	GSS08 revised as proposed. Boundary of Chipping Barnet Town Centre established through 2012 Local Plan and confirmed by Draft Local Plan and evidence base.	Yes
Friends of Finchley Way Open Space	Policy GSS08	Point g) Zero provision for car parking ignores lifestage changes. Not all work locations are accessible by tube or easily by bus. Much labour market research demonstrates that where an employee has to take more than one bus to work the job is unsustainable due to the unpredictability of the bus services. Moreover, the major leisure and sport sites being developed are not accessible by public transport from some of the town centre sites currently proposed for development. Job changes and life stage changes may compel some residents to buy a car.	Policy TRC03 has been formulated to be flexible and applied within the context of public transport accessibility	No
Finchley Society	Policy GSS08	Support (g). However, note that major developments such as the TfL site at Finchley Central are going ahead in the absence of well-defined specific local planning frameworks. This is inconsistent with this Policy.	Proposals inevitably will come forward where there is not a planning framework. In such cases we will engage with landowners and developers at an early stage to deliver individual town centre objectives.	No
LB Brent	Policy GSS08	The Council welcomes the identification of Burnt Oak Main Town Centre as a priority location for investment and revitalisation. It will be happy to engage with LB Barnet and LB Harrow in any initiative to consider a more co-ordinated way of addressing the future of the town centre as a whole.	The Council will ensure cross-borough working on proposals affecting Burnt Oak. This will be reflected in our Statement of Common Ground	No
Federation of Residents Associations in Barnet (FORAB)	Policy GSS08	Housing in town centres There is elsewhere in the document a welcome commitment to supporting the economic well-being of town centres, but achieving this is set to conflict with the aim to create 6100 homes within 400 yards of town centres. The thinking around town centres appears somewhat muddled. We are aware of the ambitious concept for North Finchley to rebuild much of the town centre combining replacement shops with increased provision of flats above. But there must be doubts about whether this or similar ambitious schemes will ever materialise given the complexity and capital required just to buy out the existing owners. What we have seen in and around town centres is the conversion of floors above shops to residential, which is ok, and the redevelopment of office and industrial workplaces to residential, resulting in loss of local employment, which is not ok. It should be possible to do more to	The Plan has been revised to reflect the changes to the Use Classes Order and the introduction of Use Class E Commercial Business and Service uses. The A1 use class no longer exists and there is greater flexibility for a former A1 use to convert to another use within the new E use class and contribute to town centre vitality and viability.	Yes

		convert secondary retail space to residential and we are surprised the Plan does not encourage this. Indeed the opposite is the case as the Plan appears to be committed to protecting all retail A1 space. More thought is needed to reconcile this Policy and Policy TOW01.		
Mill Hill Preservation Society	Policy GSS08	Mill Hill designated as District Town Centre in Table 13 but omitted from policy – should policy be renamed?	This policy applies to all 13 District Town Centres	No
West Finchley Residents Association	Policy GSS08	Support for redevelopment of North Finchley and Finchley Central, to include residential units. There is concern for conversion of family homes to smaller units. Further issue raised is the risk of overdevelopment at West Finchley based on its location within 400m from a transport hub. A locally endorsed planning framework is requested at Finchley Central. Seems to contradict slightly by protecting A1 retail and should encourage secondary retail and residential.	We welcome this support. The Plan has a bespoke policy HOU03 which will afford greater protection to family homes at risk of conversion. West Finchley is not specifically identified at GSS08 because of its proximity to North Finchley Town Centre. The A1 use class no longer exists and there is greater flexibility for a former A1 use to convert to another use within the new E use class and contribute to town centre vitality and viability.	No
TfL	Policy GSS08	We support optimising density in town centres. We strongly welcome the supporting text of para 4.19.5 and recommend going further to embed the Healthy Streets Approach in the policy text as well. We welcome the intention of part g of the policy to minimise parking provision, though 'required standard' implies that there is a minimum level of parking required. We suggest requiring 'minimal parking provision' instead. We would also welcome working with the Council on any Supplementary Planning Documents relating to town centre planning objectives to unlock growth.	We welcome the support. Revisions made to supporting text including 'alignment with the Mayor's Healthy Streets Approach' at the end of para 2.	Yes
Barnet Society	Policy GSS08 & Para 4.19.5	Agree but Chipping Barnet is economically weaker than others in and adjacent to the borough because it has to compete with Potters Bar, Hatfield, London Colney and Borehamwood, which are easy to reach by car. Conversely, Hertfordshire commuters to London are drawn to High Barnet and New Barnet Stations because over recent decades bus services in Hertfordshire have atrophied or disappeared altogether, creating extra demand for car use and parking at and around those stations. This should be recognised in the Local Plan.	The Council is seeking to encourage more sustainable forms of transport within the Borough and will use various initiatives such as controlled parking zones to encourage commuters to switch to sustainable modes of transport.	No
Finchley Society	Policy GSS09	Last paragraph, third bullet point. This is much too grudging. Read 'appropriate' for 'allowable.'	Agreed	Yes
Mayor of London	Policy GSS09	The Mayor welcomes growth being directed towards existing and new public transport infrastructure in line with his Good Growth principles. The Mayor supports these schemes and is working with the London boroughs and the Government to secure the funding and deliver these schemes. However, it should be noted that currently both the West London Orbital (WLO) and Crossrail 2 are unfunded. The latest evidence suggests that the WLO could be delivered within the Plan period (2036) and it has been agreed that there could be an uplift of at least 9,000 homes along the route without the loss of Industrial Land. To support the delivery of these schemes Barnet should add specific reference to supporting proposals that facilitate access to and delivery of the West London Orbital at Hendon. Barnet should also seek contributions towards delivery of the West London Orbital through new development. The Mayor would also welcome a more explicit commitment from Barnet to seek contributions from development to fund public transport improvements, including station improvements that are required to support and enable additional demand. In this regard, the impact of regeneration and development on wider Northern line capacity requires assessment. This assessment should not only cover where the line passes through the London Borough of Barnet, but further along the line towards central London too.	Agreed. Local Plan has been revised to seek contributions towards West London Orbital and public transport infrastructure	Yes
Finchley Society	Policy GSS09	The 'may's in line 9 and in the New Southgate paragraph are too tentative. The Council should explain the circumstances in which it would or would not prepare frameworks.	Agreed. This has been changed to 'will'	Yes

Mill Hill Preservation Society	Policy GSS09	Public transport hubs need to provide adequate parking to allow people to access effectively	Increased levels of car parking at transport hubs are not encouraged. Proposals will focus on improving accessibility for pedestrians and cyclists.	No
LB Enfield	Policy GSS09	A greater focus is needed towards developing planning frameworks for the emerging New Southgate Opportunity Area to ensure sufficient assessment of quality and capacity of a range of infrastructure investment, housing, retail and commercial opportunities relating to future growth is properly planned. This enables the implementing authorities to work closely together in delivering strategic objectives that are designed to optimise the emerging growth opportunities.	We look forward to working with the GLA, LB Enfield and LB Haringey in bringing forward an area planning framework. This will be reflected in our Statement of Common Ground.	No
TfL	Policy GSS09	We request the Council adds specific reference to supporting proposals that facilitate access to and delivery of the West London Orbital at Hendon. Like Policy GSS03 we ask that the Council request contributions towards delivery of the West London Orbital through new development. We would also welcome clarity on the number of new homes expected to be unlocked in Barnet as part of the West London Orbital. TfL will continue to work with the Council to update this assessment. We also request a more explicit commitment from the Council to seek contributions from development to fund public transport improvements, including station improvements that are required to support and enable additional demand.either picked up in this policy or elsewhere, the impact of regeneration and development on wider Northern line capacity requires assessment. This assessment should not only cover where the line passes through LB of Barnet, but further along the line towards central London too.Brent Cross Cricklewood represents a particular opportunity to create a more balanced mix of land uses than previous regeneration attempts, which have been limited by overdependence on car-oriented growth assumptions. For Barnet to deliver Good Growth, the local plan should make the case for wider investment in: rail capacity and accessible stations, delivering bus priority on key bus corridors and supporting mixed land use and local employment opportunities. TfL will continue to work with the Council to facilitate delivery of Good Growth across the borough.	The Council has revised GSS09 to clarify that contributions from development will be expected to support WLO and public transport infrastructure.	Yes
Barnet Cycling Campaign	Policy GSS09	Support development and regeneration close to major transport infrastructure if safe cycling and walking routes are provided in the locality.	Support welcomed	No
Friends of Finchley Way Open Space	Policy GSS09	Existing and major new transport infrastructure - Strongly support the assertion that noise and air quality should be taken into account when assessing planning permission.	Support welcomed.	No
TfL (CD)	Policy GSS09	TfL is not generally proposing to retain station car parking provision within its development schemes (except for designated blue badge parking for people with disabilities). Last sentence of para 4.20.11 should therefore be deleted. <del>“The required level of station car parking provision should be assessed and re-provided through a more land-efficient design approach.”</del> Not all developments would have sufficient impact to require enhancements to station / interchange capacity and access; therefore suggest rewording: <b>“If TfL determines that it is necessary, enhances the capacity, access <u>and facilities</u> of the transport interchange;”</b> The provision of multi-storey car parks would not be acceptable from a design point of view and would most likely render schemes unviable; therefore delete: <del>“Where it is proposed to develop a station car park, the Council will assess existing provision and generally support replacement car parking through a more land-efficient design approach such as a multi-storey design.”</del>	The Council will require an assessment of car parking needs as part of any proposals for station car parks. Proposals may be required to retain or re-provide car parking spaces.  Revise GSS09 to state <i>enhances the capacity, access <u>and facilities</u> of the transport interchange;</i> ”	Yes
Federation of Residents Associations in Barnet (FORAB)	Policy GSS09	Homes and new transport infrastructure - This policy suggests aspiration ignoring reality. We have more to say later on transport infrastructure and the doubts whether the ambitious schemes mentioned will be realised. Moreover, even if these schemes do happen they are more likely than not to be delivered at the very end of the Plan period or later. Any housing should follow, not precede these schemes, and so at best housing proposals directly linked to new transport infrastructure should be expressed in the Plan in very conditional terms.	The Plan has been revised to reflect timescales for WLO and Crossrail 2	Yes



Clive and Gill Hailey	Policy GSS09 & Para 4.20.10	Cross Rail 2 is unlikely to be sanctioned during the period envisaged by this Local Plan, thus the area around Oakleigh Park Rail station must not be considered an opportunity for growth and in any case is totally inappropriate for any new development whatsoever.	Irrespective of Crossrail 2 development around existing stations is inevitable if Barnet is to meet its housing target in sustainable locations and without developing on existing areas designated as Green Belt.	No
Barratt London (QUOD)	Policy GSS10	Bullet point 6 should be revised, to read “Ensure access to sufficient supporting infrastructure where the impacts of development require mitigation. This may include but is not limited to child nurseries, schools, community centres, sport and leisure facilities, and healthcare”.	Agreed	Yes
Environment Agency	Policy GSS10	Important that proposals to intensify existing residential areas mitigate and compensate for the potential increase in surface water runoff and any loss of green space. Sustainable drainage measures and green space networks should be a feature of this policy	Agreed.	Yes
Barratt London (QUOD)	Policy GSS10	Broadly support approach to estate renewal but would welcome the housing target being expressed as a minimum. Bullet point 6 should be revised, to read “Ensure access to sufficient supporting infrastructure where the impacts of development require mitigation. This may include but is not limited to child nurseries, schools, community centres, sport and leisure facilities, and healthcare”.	BSS01 establishes the minimum boroughwide target of 35,460. Table 5 sets out the sources that contribute to delivering that minimum target. Setting the housing unit target as a minimum for each source is unnecessary and reduces flexibility.	No
Home Builders Federation	Policy GSS10	This policy will need to be updated	Policy revised to reflect Mayor’s representations	Yes
Mayor of London	Policy GSS10	The Mayor would welcome working with Barnet on its Estate Renewal and Infill schemes. He is especially pleased with the draft Local Plan’s references to Intend to Publish London Plan Policy H8 (previously Policy H10) and his Good Practice Guide for Estate Regeneration. However, the draft Local Plan policy states that proposals should only take account of policy H8 and sets divergent requirements. To be in line with the Intend to Publish London Plan, Barnet’s approach must require an equivalent amount of affordable housing floorspace, including social rented floorspace, be re-provided from estate renewal schemes and that an up-lift in affordable housing floorspace be sought. The reference to car parking should include that car parking provision should not exceed the standards set out in the Intend to Publish standards set out in Tables 10.3 to 10.5 of the Intend to Publish London Plan.	Agreed	Yes
Brent Cross South Partnership (DP9)	Policy GSS11	Reference to access to active travel is supported; however, it could be broader, for example, enhancement or integration of, as well as reference to other sustainable modes of transport. We support an approach to promoting a range of transport options that provide people with choices to meet different transport needs and encourage healthy and active living.	Agreed. GSS11 revised to widen transport options.	Yes
TfL	Policy GSS11	We strongly support reductions in emissions from vehicles, including through a shift to vehicles that have no exhaust emissions and reduced brake pad emissions, though the policy could do more to set this out within the context of an overall shift away from car use.. We request that the last bullet point is rephrased to avoid supporting development proposals where they provide car parking in accordance with Policy TRC03, as it suggests that at least some car parking must be provided. We suggest referring to ‘any proposals for car parking’ being in accordance instead.	Agreed.	Yes
Finchley Society	Policy GSS11	The sentence ‘This will allow a greater quantum of development to come forward later in the Plan period’ should be strengthened to make it clear that unless the environment around the thoroughfares is improved the greater quantum of development will not be permitted.	Agreed. Text has been revised	Yes
Landsec (Indigo)	Policy GSS11	Amend the policy to reference a <b>minimum</b> of 4,600 additional new homes. Alter the text to remove reference to avoiding a ‘wall-like’ corridor of medium rise buildings.	BSS01 establishes the minimum boroughwide target of 35,460. Table 5 sets out the sources that contribute to that minimum target. Setting the housing unit target as a minimum for each source is unnecessary and reduces flexibility. The effect on visual amenity of continuous medium rise buildings should be avoided. The Council is developing a SPD on Building Heights	No

			to guide proposals and ensure building height is located appropriately.	
Highways England	Policy GSS11	As stated in your document, Highways England will be interested in any proposed development that may have a potential impact on the SRN. It should be ensured that Transport Assessments comprising an assessment of the impact on the SRN are submitted alongside these planning applications. It would be preferred that Highways England should be consulted at pre-application stage for these developments but, should this not happen, Highways England should be consulted as soon as these applications are submitted to LB of Barnet.	In support of the Local Plan a Strategic Transport Assessment has been produced.	Yes
Finchley Society	Policy GSS11	Policy should actively promote the refurbishment of redundant retail units on major thoroughfares as residential accommodation. Shops that stand empty for long periods should be designated for redevelopment along with upper floors.	Policy supports redevelopment, however not all redundant retail units may be suitable for conversion to residential.	No
Barnet Cycling Campaign	Policy GSS11	An additional 4,900 new homes along Barnet's main road corridors will add to traffic congestion unless the alternatives are much better. For cycling that means installing safe cycle tracks along these corridors, especially on strategic routes like the A5, A1000 and A598.	The Plan is very supportive of improving cycling as an active and sustainable form of travel	Yes
Friends of Finchley Way Open Space	Policy GSS11	While generally support this policy, buildings of eight stories or more can still form a wall and have a tunnelling effect on wind, thus reducing the public realm benefits of any redevelopment as they become unpleasant places to sit.	Support noted and welcomed. A SPD on Building Heights will cover design parameters on major thoroughfares.	Yes
TfL CD	Policy GSS11	Suggest that the lists in paras 4.22.1 and 4.22.5 are consolidated into a single list of routes suitable for development. Para 4.22.5 should make clear that Healthy Streets Approach and initiatives should apply to all relevant developments throughout borough. Para 4.22.5 should also make clear that density should increase in areas of good PTAL to optimise the delivery of new homes.	The Council considers it appropriate to seek improvements to these routes in order to unlock capacity. References to the wider application of the Healthy Streets Approach made throughout the Plan. There is a clear message within the Plan about optimisation of density in areas of good PTAL	No
Harrison Varma Ltd (Savills)	Policy GSS11	The proposal to encourage and support additional development capacity along the Major Thoroughfares is welcomed, most particularly in regard to the inclusion of Great North Road as one of the Major Thoroughfares. The detail of the policy, where optimum capacity will be assessed with reference to amenity and design, is also welcomed. However, it is noted that the draft policy also suggests that density will be assessed with reference to the context and character of the surrounding area. If development is to be optimised and potentially intensified, especially in close proximity to transport nodes, it is likely that higher capacity than exists in neighbouring areas could be delivered. Therefore whilst it is appropriate that design does make reference to neighbouring context, this should not limit achieving higher density where this would be appropriate in delivering additional homes and especially in close proximity to transport nodes and major thoroughfares.	The Council welcomes this support. It considers that there is sufficient flexibility within the Local Plan to support high quality development that optimises density. The Council intends to produce small sites design code once the Local Plan is adopted. This is reflected in revisions to CDH01	Yes
Land owner at 360-366 Burnt Oak Broadway,	Policy GSS11	We strongly support this policy. The Edgware Road corridor provides significant potential development capacity for new housing in particular and we support the Council's GSS11 spatial policy which seeks to support the delivery of such development in a planned manner. The Edgware Road/A5 corridor is particularly suitable for taller buildings due to the low sensitivity of the surrounding townscape context (in most parts). While the policy recognises the potential for tall buildings here, we recommend that this should be strengthened to specifically support tall buildings as a means of ensuring that sites are genuinely optimised (with reference to Policy CDH01). We support the allocation of sites (i.e. inclusion in the Schedule of Proposals) within this designated area. In addition, and as per our comment to GSS01, we strongly support the in-principle support for additional (unknown) sites to come forward in the future. We consider this to be particularly important on account of the nature of the existing pattern of (mainly commercial) land uses and the land ownership/lease status of many of these sites which means that sites can become available for development at short notice. We reiterate the point made earlier in relation to sites not already identified being important in supporting housing delivery and meeting the Borough's housing targets.	The Council will be producing a Building Heights SPD. The SPD will enable the Council to provide a clear and well considered response and design guidance to proposals for buildings of different heights including tall buildings and to ensure that the development of various building heights occurs in the most appropriate parts of the Borough.	Yes

LB Brent	Policy GSS11	The Council recognises the identification of A5 Watling Road as a major thoroughfare. It supports the policy in relation to development achieving 'a high-quality design that enhances visual amenity and does not contribute to a continuous 'wall like' corridor of medium rise buildings between town centres' and also where it 'Contributes to an improved and more active streetscape and facilitates delivery of healthy streets approach' in particular. It recognises the identification of the A5 as 'suitable for tall buildings in some sections'. This is consistent with LB Brent's identification of the corridor in parts for tall buildings. The Council would like to work with LB Barnet to ensure that the identified locations are complementary and that Brent has some input into the A5 tall buildings study that LB Barnet has indicated that it is looking to progress.	We welcome the contributions made by LB Brent to the A5 Heights Strategy which has been fed into the Tall Buildings Update This will be reflected in our Statement of Common Ground.	Yes
LB Harrow	Policy GSS11	LB Harrow is in discussions with both LB Barnet and LB Brent in relation to development and regeneration along the A5, and it is encouraged that this dialogue continues for a comprehensive approach to development along the A5. The Draft LB Barnet plan provides policy through GSS11 (Major Thoroughfares), which identifies such thoroughfares as having good growth potential. LB Harrow supports the overarching principle of Policy GSS11, specifically where it relates to an improvement to the A5, which forms the administrative boundary between the two boroughs. Development / regeneration of this corridor is considered to be an appropriate position, specifically where development is brought forward with the Healthy Streets Approach. Accordingly, LB Harrow concur that the alternatives put forward in terms of a policy approach would not be appropriate. The draft Plan refers to development heights of tall buildings (8 storeys or more) along major thoroughfares, also needing to comply with policy CDH04. Whilst it is encouraged that a specific assessment be undertaken for such developments, LB Harrow do not have any formal guidance as to what would constitute a tall building on its side of the A5. In the absence of such evidence, LB Harrow would seek further dialogue in relation to tall buildings, to ensure that a holistic approach to the development of (specifically) the A5 would not appear as a borough boundary with a disjointed approach to developments. Harrow has recently commissioned a Characterisation and Tall Building Study for the borough. The preparation of this study represents an opportunity to understand Barnet's approach to tall buildings and constructively engage with Barnet in the development of Harrow's evidence base in relation to tall buildings (including design principles). LB Harrow does not object to any of the policies that have a direct impact on the development that would occur on or adjacent to the administrative boundary with LB Barnet. LB Harrow agrees with the Policy approaches put forward, and accordingly agree that the alternatives put forward not be appropriate. Notwithstanding this, development along the common administrative boundary has the potential to impact on LB Harrow and its residents. A holistic approach to development within these locations is considered appropriate to ensure that administrative boundaries are seamless in character, and impacts on LB Harrow residents can be appropriately mitigated.	We welcome the contributions made by LB Harrow to the A5 Heights Strategy which has been fed into the Tall Buildings Update This will be reflected in our Statement of Common Ground.	Yes
Barnet Cycling Campaign	Policy GSS12	The proviso that car parking spaces will [only] be released if surplus to requirements or re-provided will not drive the sort of change needed to support other policies on active travel and climate change.	Council is committed to delivery of sustainable and active travel.. It is proactive in promoting travel behaviour modal shift and reducing car parking. However, use of the car will remain important and an adequate level of parking provision needed.	No
Federation of Residents Associations in Barnet (FORAB)	Policy GSS12	We note the intention to maintain car parking as part of any redevelopment, but it will be inescapable that a car park would have to be closed for a considerable period of time whilst redevelopment takes place. Such is the fragile state of our town centre economies that we view this idea with some foreboding. Pedestrianisation schemes and other changes to the public realm to make the experience better for visitors to town centres, which are being encouraged, do often lead to some loss of parking. We do not wish to see any more parking spaces lost than necessary. Whilst some car parks may lend themselves to redevelopment without disruption, we consider this policy needs to be approached with extreme caution, and the need to do this should be reflected in the text.	National and London Plan policy supports the more efficient use of land including car parks. Text revised to ensure flexible application of GSS12 will be necessary in terms of alternative provision during re-development. The policy requires a demonstration that capacity is surplus to requirements.	Yes

Friern Barnet and Whetstone Residents' Association	Policy GSS12	Policy GSS12 supports the development of surface level “public car parks” subject to provisos. The proviso that parking spaces can be demonstrated as being surplus to requirements or re-provided as needed” should be strengthened so that proposals which do not satisfy this will be refused, not merely “not supported”. It should be clarified in GSS12 itself that this policy only applies to Council owned car parks. However similar tests should apply for the protection of other (private) car parks, such as those located at identified potential development sites (including TfL Underground stations) as these too form much needed parking facilities.	National planning policy supports the more efficient use of land including car parks. GSS12 applies to all publically accessible car parks. Text revised to ensure flexible application of GSS12 will be necessary in terms of alternative provision during re-development. The policy requires a demonstration that capacity is surplus to requirements.	Yes
TfL	Policy GSS12	The redevelopment of car parks, particularly in well-connected locations, is a key opportunity to make a more efficient use of land to address London’s housing crisis and reduce congestion at the same time. The policy refers to the loss of spaces that are surplus to ‘requirement’ or re-providing based on ‘need’. However, it makes no reference to how ‘need’ will be assessed. The availability of parking creates incentives to use it and therefore demand for spaces do not necessarily indicate ‘need’ as those driving there could have good alternatives. Any ‘need’ identified would also have to be weighed up against the impact of accommodating it, particularly congestion, road danger and emissions, sometimes in locations where these problems are already more acute. Planning for a sustainable London must be based on demand management rather than predict and provide. We urge the Council to give clearer support to reducing levels of parking where car parks are redeveloped. Car parking is a space-hungry and inefficient use of land, especially in built-up, well-connected areas. Provision or retention of car parking leads to car dominance in the public realm, which creates a less attractive environment for walking and cycling. It also does not align with the Council’s ambition as set out in Policy GSS11 to reduce vehicle emissions – cars create air pollution both from exhaust emissions and from brake pad wear. A policy requirement to retain car parking as part of redevelopment also limits the optimisation of development density.	The Council has been proactive in introducing this policy. For this policy to succeed there has to be a specific Barnet approach which demonstrates that the Local Plan is responding to local circumstances. GSS12 and supporting text has been broadened to clarify how spaces will be quantified as surplus and any re-provision justified.	No
TfL CD	Policy GSS12	TfL will not generally provide replacement station car parking (except for people with disabilities). Therefore the second bullet should be deleted as it would not be in accordance with the MTS and draft NLP and would not be sound once the latter is formally adopted.	See response above to TfL Spatial Planning	No
Mayor of London	Policy GSS12	The Mayor welcomes the redevelopment of Barnet’s car parks. Any re-provision of car parking spaces should be minimised and should not exceed the Intend to Publish car parking standards.	See response above to TfL	No
CPRE	Policy GSS12	Car parking at stations should <u>not</u> be retained even with more efficient land use, and space should instead be used to plan for much greater use of bus connections or cycles	The Local Plan approach to car park development as reflected in GSS12 is more realistic, recognising that proposals need to demonstrate no knock on effects of removing parking capacity.	No
Friends of Finchley Way Open Space	Policy GSS12	Car Parks - Vital that car ownership is not under-estimated as this will lead to pavement parking and general congestion.	The policy requires a demonstration that capacity is surplus to requirements.	No
Barnet Society	Policy GSS12	Policy and related paragraph should recognise the extra demand for car parking at stations close to Hertfordshire. Wholesale removal of parking at High Barnet and New Barnet Stations would be counter-productive, displacing cars onto local streets and discouraging car-sharing and other integrated transport solutions.	The Council is seeking to encourage more sustainable forms of transport within the Borough and will use various initiatives such as controlled parking zones to encourage commuters to switch to sustainable modes of transport.	No
Barratt London	Policy GSS12	Policy GSS01 refers to “Other large sites including car parks”, albeit Policy GSS12 is drafted to only refer to car parks. Consider that the flexibility of the Plan should retain recognition that there will be major windfall sites over the life of the plan, including car park sites.	Whilst it is likely that there will be major windfall sites other than car parks, the Council wants a specific policy relating to development potential of existing surface car parks.	No
Environment Agency	Policy GSS13	Although we support the policies intention to activate open spaces alongside improvements to nature conservation and biodiversity enhancements, we think Barnet’s rivers should feature prominently within this policy. Given the specific endorsement within the All London Green Grid, we recommend the policy	Agreed	Yes

		is amended to include river restoration as one of the improvements that can be delivered, with some supporting text in section 4.24 to expand further (see suggested wording below in red text). The Council will seek to activate open spaces across Barnet through new and improved outdoor sports, leisure and recreational facilities. Such improvements will be delivered alongside nature conservation and biodiversity enhancements such as river restoration.		
Elizabeth Silver	Policy GSS13	Add: Improvements should not mean commercial or built-on development, or pay-for recreational facilities. They should include maintenance of the green space as a natural environment e.g. as woodland.	The Council aims to provide a range of parks, open spaces and leisure facilities across the borough to suit the needs of all users. ECC04 seeks to optimise the benefits of open space and create more accessible green spaces through a range of measures.	No
Barnet Cycling Campaign	Policy GSS13	Support the establishment of a Regional Park within the Brent Valley / Barnet Plateau area but ask for fuller details of what is proposed. In particular for good cycling facilities in it similar to the Lee Valley Regional Park.	The establishment of a Regional Park is at a very early stage. However it remains an ambition of the Council within the lifetime of the Local Plan.	Yes
Ramblers Association	Policy GSS13 & CHW02	Supportive	Welcome the support	No
Environment Agency	Policy GSS8	Green spaces within an urban setting planned to foster an interconnected network of green infrastructure should be promoted in the policy. GSS08 does not acknowledge opportunities for improving the natural environment and we would like to see this included so it is clear what applicants are expected to achieve.	Agreed.	Yes
Home Builders Federation	Figure 3	The housing trajectory should use the OAN housing requirement figure of 3,060 dpa, rather than the Draft London Plan figure of 2,364 dpa. Table 5 indicates that 16,950 homes in total can be delivered in the first five years of the plan (2021/22 – 2025/26). This would equate to an annual average of 3,390 homes. This does not appear to be reflected in the Trajectory as only two bars on the chart showing projected completions exceed the 3,000 mark. This suggests that the Housing Trajectory is based on the Draft London Plan targets (as para. 4.7.5 states) while Table 5 is merely demonstrating the Council's own local aims. This will need to be clarified to avoid confusion. This may be because the Housing Delivery Test requires that local authority performance in terms of housing delivery is monitored against the most up-to-date London Plan targets. The Council should clarify this, but a trajectory is needed to show how the Council intends to deliver the Local Plan housing requirement even if its performance by Government will be measured against the London Plan target.	The housing target is now the London Plan target of 35,460. Through the Local Plan we can demonstrate that this target is deliverable  Paragraph 0.0.21 of the London Plan 2021 sets out that boroughs do not need to revisit the housing targets set by the Mayor. In addition to this paragraph: <b>013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance</b> is clear that where a spatial development strategy (in this case the LP2021) has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to revisit their local housing need figure when preparing new strategic or non-strategic policies.	Yes
St William Homes LLP	Figure 3	The London Plan Inspector's Panel Report found that the 2017 SHMA though provided a reliable starting point for the housing needs of London, they concluded the reliance on small sites was not fully justifiable or achievable. The Mayor accepted this and lowered the overall housing target (although highlighting that the target remains a minimum). The Panel Report made it very clear that an early review of the London Plan is expected; the Secretary of State's letter to the Mayor of July 2018 indicated an expectation that the Plan should be reviewed <i>immediately</i> once it has been published so that new national policies in the 2019 NPPF, including the standardised methodology are accorded to at the earliest opportunity. In addition to this, the SoS Direction on the London Plan issued 13th March 2020, makes it clear that London needs a step change in delivery of housing. The Council's Housing Trajectory shows that the Council have not delivered 2,349 new homes in the past 15 years. The highest rate of completions achieved was 2,016 in 2012/13. As part of the Local Plan process, the	The housing target is now the London Plan target of 35,460. Through the Local Plan we can demonstrate that this target is deliverable  Paragraph 0.0.21 of the London Plan 2021 sets out that boroughs do not need to revisit the housing targets set by the Mayor. In addition to this paragraph: <b>013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance</b> is clear that where a spatial development strategy (in this case the LP2021) has been published, local planning	No

		unmet housing need should be considered. The Council should not stifle needed homes growth, in doing so the Council needs to accept that a step change in delivery is needed.	authorities should use the local housing need figure in the spatial development strategy and should not seek to revisit their local housing need figure when preparing new strategic or non-strategic policies.	
John Cox	Table 5	First of all, for the general non-expert reader there is confusion in other London borough Local Plans about the use of the words “Small sites” and “Minor sites/[developments]”. It is not clear that you are innocent of that confusion, so please review the clarity in your use of the terms. Neither is in your glossary. It is also not immediately clear what efforts you are making to introduce financial contributions towards off-site affordable housing, from sites up to 9 units. A viability study might test 5, 7 or 9 units, but it would be just as easy to test 2 or 3 units. What are the borough’s proposed contribution amounts per unit? (LB Islington usually gets about £50k/unit.) In September 2019 the Planning Inspectorate accepted Tower Hamlet’s Draft Local Plan specifying 2 to 9 units after viability testing. That borough expects to get about £65-million over 10 years as a result. That also means that eight London boroughs are now getting some contributions from minor sites.	Small Sites are defined in the Glossary. The approach on affordable housing is clearly set out in HOU01.	Yes
Mill Hill Missionaries	Table 5	Identifying and allocating the necessary quantum of land that is appropriate for residential development is crucial, and it is therefore suggested that the Council align with the ‘Intend to Publish’ small sites target and find any additional sites needed to address the small site shortfall.	Table 5 shows that the minimum housing target of 35,460 is deliverable. This reduces reliance on the contribution of small sites	No
Home Builders Federation	Table 5	HBF welcomes the Council’s aim to ‘frontload’ housing delivery and not rely on more homes being delivered towards the end of the plan. The fact that the Council might be able to deliver 33,750 homes in the first ten years of the life of the Plan – a figure that would exceed the OAN requirement for 30,600 homes – indicates that it would be reasonable to plan for ten years rather than 15. However, the base date of the Local Plan should be the same base date as the Draft London Plan – 2019/20. Table 5 indicates that some 3,400 homes could be provided on small sites, or 5,100 over 15 years. LONDON PLAN Policy H2 aims to increase the supply of small sites to support smaller developers, especially in the outer London boroughs. LONDON PLAN Table 4.2 establishes 10-year minimum targets (2019/20 - 2028/29) for net housing completions on small sites (below 0.25 hectares in size) for each London planning authority. For Barnet, the ten-year target is a minimum of 4,430 homes. This is about 1,000 homes higher than the number that The Council anticipates providing on small sites. HBF strongly recommends that the Council aligns with the Draft London Plan Intend to Publish small sites target. Increasing the number of small sites by identifying these and allocating them in the Local Plan will be key to improving the pace of housing delivery across Greater London and the nation. Allocating a more diverse range of sites, both in terms of size and location, will help diversify production, diversify build types, and increase competition among housing providers. This will help improve build-out rates and, hopefully in the long run, improve affordability. This is something that the Government has come to realise through the Letwin Review. National policy now requires all local planning authorities to identify land of one hectare or less to accommodate at least 10% of the overall housing requirement (NPPF, para. 68). For Barnet, that would require land for at least 3,060 homes to be provided on small sites of one hectare or less over the ten-year life of the Local Plan. Table 5 suggests that the national policy requirement is achievable but that the LONDON PLAN Intend to Publish small sites target may not be achieved. Second, it is unclear how this small site figure has been derived. Is this a small site assumption based on past windfall trends (as the LONDON PLAN target is derived), or is it underpinned by actual land allocations? If it is a windfall trend, then HBF would strongly caution the Council against an assumption that this will satisfy the new requirements of national policy. Identifying and allocating land that is appropriate for residential development in the Local Plan is critical to supporting the growth of SME developers, since one of the chief financial obstacles small builders face is trying to establish the principle of residential development on sites not allocated in local plans. We have noted the background paper called Site Selection Background Report, December 2019.	This Plan needs to be in general conformity with the London Plan and the Mayor has not raised an issue about the timeframe of Barnet’s Local Plan.  Table 5 shows that the minimum housing target of 35,460 is deliverable. This reduces reliance on the contribution of small sites	Yes

		It is interesting that this paper does not refer to para. 68 of the NPPF and its requirement that 10% of the housing requirement is delivered on sites of one hectare or less, or 0.25 ha in the case of London. Para. 3.3.6 refers to the Council operating a site threshold of 0.1 ha to identify small sites. It is unclear from appendix 2 – the list of sites considered deliverable and developable – which of these are the sites that fall within the 0.1ha and 0.25ha window. These are precisely the sort of site sizes that should be allocated in increasing numbers to enable London’s housing targets to be achieved. Without an allocation it is much harder to secure a planning permission. Without a planning permission it is nearly impossible for SMEs to secure finance from banks and other lenders. Banks will rarely lend until a developer has a full, implementable, planning permission. As SMEs cannot afford to spend money promoting sites through the planning system this is one of the chief reasons why the number of SMEs has collapsed by 80% since the inception of the plan-led system in 1990.		
St William Homes LLP	Table 5 & Policy GSS08	The general approach to delivering sustainable growth by focussing development within growth areas, district town centres and around transport hubs is supported and presumption of brownfield first is fully supported. Table 5 indicates only 13% of growth to occur within district town centres. If Council wishes to minimise Greenbelt release, development in the district centres needs further exploration – growth scenarios in line with GSS01 and GSS08 will need updating to reflect this and specifically, draft policy GSS08 should include text relating to the role district centres can play in delivering needed growth in a sustainable manner. In addition, GSS08 should make it clearer that residential - led development will be supported. Many of the Town Centre Frameworks which the Council expect to provide the basis for managing and promoting positive change in town centres are out of date and therefore should not be relied on to promote the change and growth envisaged by the Local Plan itself.	Support welcomed.. Our aim is to bring forward frameworks that can shape future growth. This is reflected in the work at Edgware and North Finchley. Proposals inevitably will come forward where there is not a planning framework. In such cases we will engage with landowners and developers at an early stage to deliver individual town centre objectives.	No
Federation of Residents Associations in Barnet (FORAB)	Chapter 5	Demolish and Redevelop - The Plan seeks to be explicit on conversions and extensions to provide appropriate protection, but is silent on proposals to demolish a detached family home or a pair of semis and replace with a small block of flats. Many such applications have been made in recent years and, as with conversions, planning decisions have not been consistent. We anticipate that without explicit controls such applications will increase. We suggest a policy similar to that for conversions is needed. With the presumption that such proposals will normally need to conform to the same clauses (a) to (g) along with the limitation on roads characterised by houses.	Agreed that an approach that is consistent with HOU03 is required in terms of redevelopment. Continuing to resist the loss of existing larger homes should help ensure that the dwelling stock remains balanced in Barnet and capable of providing housing choice.	Yes
Friends of Finchley Way Open Space	Chapter 5	Support the reduced number of homes to be built in the period of the Plan. Targets must take account of need but also of demand, capacity to build and land availability as well as the wellbeing of existing residents. As population density increases, smaller and more local green spaces will be needed for play, relaxation, fresh air, etc. Existing parks, recreation grounds and small green spaces need funding in order to be maintained in proper order. Current Green spaces Team is too over-stretched to support the number of sites in the borough. It is important that new dwellings are capable of adapting to needs as people age and/or that a suitable range of accommodation is available for sale and to rent. There is a tendency to assume that people move straight from being able bodied to being in a wheelchair and needing care. In fact intermediary levels of fitness (such as having difficulty with steps and using a walking stick) that do not require formal care but need domestic adjustments and easier access to public transport, last much longer during the 70s and 80s. It is also often assumed that downsizing means moving to a one bedroom flat. People in their 70s and 80s today want active social space for entertaining and spending more time at home in retirement, they may want studies and utility rooms. They may also need bedrooms for grandchildren to stay. Encouraging older people to vacate traditional family houses will require changes to stamp duty as this often makes moving uneconomic, given the relative price of flats compared to houses in the borough.	The minimum housing target of 35,460 is based on the London Plan. Housing targets are set through the London Plan and based on assessments of capacity and need. It is important that homes are adaptable to changes in peoples life cycles and that an appropriate choice of housing and level of support is provided to enable people to live independently to for as long as possible.	No
Barnet Society	Chapter 5	Support the views submitted by FORAB.	Support for FORAB’s views noted.	No

Brent Cross South Partnership (DP9)	Chapter 5	We support reference within housing policies and supporting text to the importance of providing a broad range of tenures, including build to rent, to ensure the delivery of a range of housing types.	The Council welcomes this support	No
Verena Donig	Chapter 5	Lack of support for homeless people in the Borough.	The Local Plan forms part of the Council's efforts to deliver housing in the Borough to meet the needs of the population, including the homeless.	No
Brent Cross South Partnership (DP9)	Chapter 5	Flexibility should be applied to ensure that a mix of housing types is delivered and the housing typologies and unit mixes within them (where relevant) should be assessed on a case by case basis taking account of site and area specific circumstances.	There is flexibility within the Housing Mix policy	No
Isaac Isaac Saul	Section 5.9	I object to student accommodation plans. We need more resident parking as there are few spaces for residents and students park blocking our spaces	Chapter 11 clarifies CPZ process	No
Finchley Society	Para 5.11.4	Second sentence should explain the legal basis of these requirements. If they are within Barnet's control 90 should be reduced to 60 and should not be continuous.	Agreed. New text added on legal basis for the 90 days	Yes
Modomo (Modular Housing) (Collective Planning)	Para 5.11.5	<del>Corresponding to above 'The Schedule of Proposals in Annex 1 sets out specific sites where meanwhile uses are appropriate. The Council will work with developers and landowners to identify appropriate sites for meanwhile uses.'</del>	Agreed. Wording revised	Yes
Clive and Gill Hailey	Para 5.13.1	Back Land developments / garden grabbing is an abomination and must be prevented. Local issues resulting in court cases have graphically illustrated how the Title of lands proposed for access to potential back land / garden grabs must be fully researched, validated and legalised as part of the planning process - developers must prove they have permission to access the land with vehicles, machinery and utility supplies.	The Plan seeks to protect back gardens as an important part of Barnet's suburban character and contribution to sustainability	No
Former MHNF	Para 5.13.2	We agree that Self Build and/or modular building construction should be encouraged. It delivers a quality product at greatly reduced cost. If such an initiative could be included in projects using Public Sector land, there would be significant benefits to those residents who have grown up in the area and wish now to have a home of their own. Will the Local Plan actively seek sites for self-build? And if so, there needs to be an appropriate code of construction in place alongside, plus cross references to local character and design (without wishing to stifle innovation).	The Local Plan's approach to self-build is in accordance with the 2015 Self Build and Custom Housebuilding Act. Neighbourhood Plans can play a more active role in identifying sites for self-build.	No
Finchley Society	Para 5.2.4	Add a further bullet point: 'multigenerational developments to enable older persons and young persons to live together'	Agreed	Yes
Finchley Society	Para 5.2.4	There should be an indication here of how many 'homes to meet the needs of older people and those with disabilities including young people needing support' have been provided in recent years.	Figures on need for Older Persons Housing up to 2036 is set out in Table 8. The Plan at Policy HOU04 sets out how it will address housing choice for people with social care and health support needs.	No
Brent Cross South Partnership (DP9)	Para 5.2.4	We strongly support the recognition that a mix of housing types is required.	The Council welcomes this support.	No
Finchley Society	Para 5.2.4	Last but one bullet point. Good	The Council welcomes this support.	No
Middlesex University (Tibbalds Planning)	Para 5.2.4	The recognition within the Local Plan (Paragraph 5.2.4) that purpose built student accommodation to support higher education institutions is an important part of the mix of housing types that are needed to meet the Borough's needs is therefore welcomed.	The Council welcomes this support.	No
Finchley Society	Para 5.3.1	Line 4. 'generated by demographic growth' is simplistic. The paragraph should recognise that there are other factors: houses as investment and demand is not unaffected by supply (e.g. young people move if it's easy but stay at home if it isn't).	Agreed that the context is more complex. Revised text to reflect this.	Yes



Finchley Society	Para 5.4.11	Add at end 'Every effort must be made to replace the numbers of social housing units lost through estate regeneration so that as many, or more, social housing units are achieved.'	Policy HOU01 has been revised to clarify the approach to Estate Regeneration	Yes
Finchley Society	Para 5.4.4	This has the perverse effect of restricting many flat developments to 10 when the site could take two or three more. The sentence in the Alternative Options box 'The proposed policy will assess the capacity of sites under the threshold to ensure development is at an optimum capacity' gives some reassurance and should be imported into the main text.	Ensuring efficient use of capacity has been a longstanding approach to securing affordable housing. The text has been revised	Yes
Home Builders Federation	Para 5.4.6	We note in paragraph 5.4.6 that the sub-regional SHMA has assessed a high need for affordable housing – some 23% of the total need, or 10,600 homes by 2036. We note that the Council intends to adhere to the Draft London Plan threshold policy approach to help deliver more affordable housing. This is sensible. HBF hopes that the Council will monitor the effectiveness of this policy mechanism. This could help to improve the supply of affordable housing across Greater London.	The Council welcomes this support.	No
Finchley Society	Para 5.4.7	The Viability Assessment should be consulted on separately before it appears at the Reg 19 stage.	The Viability Assessment has been published as part of the Reg 19 evidence base	No
Finchley Society	Para 5.5.2	Strongly supported.	The Council welcomes this support.	No
Finchley Society	Para 5.5.5	Produce the evidence. A family may well have more than one child, and of different sexes.	Table 9 shows that a 2 bedroom property of 70m2 to 79m2 GIA could accommodate 4 persons. This could be a couple with young children sharing a bedroom.	No
Finchley Society	Para 5.6.4	Space standards expressed in m2 only do not guarantee good and usable space standards. As well as provisions about floor areas the Lifetime Homes guidelines should be reinstated. Conversions quite often result in tortuous layouts owing to the constraints of the physical existing building. 74m2 is too small for 3 bedrooms, and should increase.	The space standards are an essential tool to support good quality accommodation that is delivered through the planning system.	No
Home Builders Federation	Para 5.7.2	Table 4.3 of the Draft London Plan establishes annual borough benchmarks for specialist older persons housing for the period 2017-2029. HBF would like to see the benchmark target for Barnet reflected in a separate and specific policy in the Barnet Local Plan- i.e. that the council will aim to deliver 275 units of specialist older persons housing each year. Although London is a relatively young city, the GLA expects those aged 65 and over will increase by 37% over the next decade. The Council identifies a growing need for specialist accommodation for older people of all types in Barnet (para. 5.7.2). National planning policy places a strong emphasis on improving the supply of older persons housing (NPPF, para. 61). The supply of such homes will also contribute to diversifying housing types and this will help to improve build-out rates. Reflecting the Draft London Plan benchmark target does not mean that this target will become a 'binding' target that has to be delivered by the local authority. Instead it will provide the Council with something to aim for, and to monitor its performance against. However, to avoid the benchmark target being ignored, we recommend that the new policy states that a 'presumption in favour' of older persons housing schemes will come into effect if the benchmark target has not been achieved in the previous year. The Council should record the delivery of specialist older persons housing as part of its Annual Monitoring Report.	This benchmark is clearly reflected in HOU04 and a specific policy is not merited. Indicators for monitoring the Local Plan have been published. This includes specialist older persons housing.	No
Finchley Society	Para 5.7.5	This paragraph should indicate where the homes for these young people are to be built and by whom.	The preferred locations for housing young people are sites that are within 400m of local shops and are easily accessible by public transport. As a strategic document covering 15 years the Local Plan is unable to be specific on who will build such homes.	No
Finchley Society	Para 5.8.2	The applications for an HMO Licence and planning permission for Change of Use should not be considered separately. Approval for Change of Use from C3 to C4 should be granted before an HMO Licence is considered (with greater transparency and liaison between the Council departments responsible). It should be mandatory for all HMO owners to acquire a formal accreditation through the	Process on HMO licensing is clarified	yes

		London Landlord Accreditation Scheme - mere encouragement is unrealistic and ineffectual. High standards of space and accommodation should be required. Most of these establishments are rented out to young people who may not be aware of their rights or who to complain to. Furthermore, they may not even be aware that some of practices (e.g. untidy front areas – having friends staying overnight etc. etc. – thus, increasing the comings and goings of the premises) impact on neighbours. HMOs should have Managers living on site in order to maintain standards.		
Brent Cross South Partnership (DP9)	Para 5.8.2	Ensure that Build to Rent (BtR) falls outside of the requirement of an HMO license.	We expect BtR products to be in Use Class C3.	No
Middlesex University (Tibbalds Planning)	Para 5.9.1	The University is pleased that the Local Plan recognises that higher and further education institutions make a significant contribution to the economy and labour market, and that new purpose-built accommodation will meet identified needs in the Borough and help take pressure off the conventional housing stock (Para 5.9.1).	The Council welcomes this support.	No
Finchley Society	Para 5.9.3	Student accommodation should be located where the need to commute is at the absolute minimum.	That is certainly reflected in the proposals for student accommodation around the Hendon Campus of Middlesex University.	No
Finchley Society	Paras 5.4.8 & 5.4.9	These paragraphs show the clear contrast between the London Plan target of 50% affordable housing and the Barnet minimum figure of 35%. If the Barnet Plan is to be deemed 'sound' at the Examination-in-Public it will have to demonstrate that the 35% minimum is compatible with a 50% target or that it would be unreasonable for that target to apply to Barnet. If material in the SHMA does help this it will have to be spelt out in the Plan.	The Mayor of London has not objected to this approach	No
Barnet CCG	Policy HOU01	Suggest that fifth paragraph of the policy is amended to read: "Innovative housing products that meet the requirements of this Policy will be supported, including approaches that set aside a proportion of homes on land owned by Government departments and agencies for key workers, such as health and education professionals."	Agreed – However policy on keyworker housing is largely a matter for the Housing Strategy	Yes
TfL CD	Policy HOU01	The second paragraph of the policy and paragraph 5.4.1 are unclear. Rewording is suggested, based sequentially on habitable rooms, then habitable floorspace. Para 5.4.8 makes an incorrect assertion: the 50% threshold level for public sector land applies to public sector land where there is no portfolio agreement with the Mayor. Suggest re-wording.	Agreed	Yes
John Cox	Policy HOU01	I would make a plea that your presentation of evidence and your consequent reasoning should be reviewed (independently but internally) so that you are satisfied that it is crystal clear to the general non-expert reader. The public successfully lobbied at the new London Plan EiP that definitions of affordable housing categories needed to be separated. There is a difference in costs between social and London Affordable Rent homes and a regressive impact that the latter may have on low-income households in Barnet. It is arguable (although unachievable) that affordable targets should just be for social-rented homes. Nevertheless, every part of your affordable housing material should be reviewed, so that the separation of definitions is documented properly on every occasion without exception. Barnet should consider setting separate targets for social and London Affordable Rent - to ensure that these homes are not all delivered at London Affordable Rent, and to show a commitment to delivery of social-rented homes to meet the needs of low-income households.	HOU01 reflects Barnet's Housing Strategy and has been revised to align with the London Plan.	No
Barratt London	Policy HOU01	The policy requires that the "the basis of calculations for the affordable housing requirement will relate to a combination of units, either the number of habitable rooms or the floorspace of the residential development". This is ambiguous and should be revised to relate to habitable rooms, in conformity with the Intend to Publish London Plan (2019).	HOU01 revised to be consistent with London Plan.	Yes
Brent Cross South Partnership	Policy HOU01	Further clarity is needed on the methodology for calculating affordable housing, and it would be helpful if one basis for calculations (e.g. habitable rooms) was specified.	Methodology has been further clarified	Yes

Barratt London	Policy HOU01	Broadly support the approach taken which will seek a minimum of 35% affordable housing on all developments of 10 or more dwellings. However, it is unclear what "a minimum" requires, and whether the policy is aligning itself with the Intend to Publish London Plan FastTrack Approach, or indeed setting its own FastTrack approach at 35%.	Provision and delivery of affordable housing needs to accord with the NPPF and is within the context of the strategic London Plan minimum figure.	No
Redrow Homes	Policy HOU01	Clarification to part b) of the policy to allow any other form of affordable housing that comes forward and is defined as being an 'intermediate' housing product.	Part b refers to intermediate housing (in line with London Plan) and therefore includes any affordable housing product that is considered 'intermediate'.	No
Mayor of London	Policy HOU01	The Mayor welcomes the reference to his 50% strategic affordable target in draft Local Plan Policy HOU01 and at paragraph 5.4.8. In this regard, the reference to a 35% strategic target at paragraph 5.4.6 should be clarified as being a 50% strategic target or 35% minimum threshold for schemes of 10 or more residential units. As stated above under the Spatial Strategy (Estate renewal and infill) section, the policy and supporting text must ensure affordable housing floorspace is replaced. In line with Intend to Publish London Plan Policy H8, demolition of affordable housing, including where it is part of an estate redevelopment programme, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace. Affordable housing that is replacing social rent housing must be provided as social rent housing where it is facilitating a right of return for existing tenants. Where affordable housing that is replacing social-rent housing is not facilitating a right of return, it may be provided as either social rent or London Affordable Rent housing. Replacement affordable housing should be integrated into the development to ensure mixed and inclusive communities. Draft paragraph 5.4.10 of the Local Plan states that the basis of calculations for affordable housing requirement will relate to a combination of dwellings, number of habitable rooms or floorspace. It should be noted that for schemes referred to the Mayor, the percentage of affordable housing will be calculated by habitable rooms in line with Intend to Publish London Plan paragraph 4.5.3. To be in line with Intend to Publish London Plan policies H4, H5 and H6, the affordable housing products must meet the definition set out in the Intend to Publish Plan.	Agreed – policy is consistent with the London Plan	Yes
Barnet CCG	Policy HOU01	Supports affordable housing policy, including the affordable housing tenure split and notes that the Council will support innovative housing products that meet the requirements of the policy.	Support for policy including affordable housing tenure split welcomed.	No
Marsfield	Policy HOU01	Update to state that this policy will be applied to SOPH proposals in line with the provisions of the new policy outlined above.	The Council does not consider a stand alone policy is merited	No
Taylor Wimpey North Thames	Policy HOU01	Support	The Council welcomes this support	No
Finchley Society	Policy HOU01	'Within the context of a strategic London Plan target of 50%' does not support Barnet's figure of 35% minimum. That figure of 35% will have to be increased.	The Mayor of London has indicated that he is happy with this approach	No
St William Homes LLP	Policy HOU01	Text as set out in para 2.2.1 ' <i>This Plan will seek efficient use of previously developed land and Barnet's existing housing stock. It will support opportunities for tenure diversity when it can bring development forward quicker</i> ' needs to be incorporated within Policy HOU01, relating to housing tenure.	The Plan supports efficient use of previously developed land. The approach to the housing stock has to be more nuanced in getting the balance right to address housing needs. Revise para 2.2.1.	No
Gwyneth Cowing Will Trust	Policy HOU01	The policy on affordable housing is unclear and allows the amount to either relate to the number of units, or habitable rooms, or the amount of floorspace. The council should continue with an approach which enables the amount of affordable housing required to be achieved either in terms of number of homes or the amount of floorspace	The policy wording will be amended to be consistent with the London Plan.	Yes
St William Homes LLP	Policy HOU01	Former utility sites are unique in both use and character; they are challenging and abnormally expensive to redevelop and regenerate compared to delivery of development on other brownfield sites. In addition, they can also have ongoing operational requirements requiring physical infrastructure and easements which can considerably reduce the developable site area. The further challenge for any developer on these typically complex sites is the quantum of upfront costs required to make the sites adequate for residential delivery – this impedes on a site's capability to deliver Council's minimum levels	There is no need to make specific reference as there is flexibility enough in HOU01	No

		of affordable housing. Whilst St William generally supports the Council's approach, the Plan needs to make reference to exceptional cases where a more flexible approach may be needed.		
Countryside Properties (Terrance O'Rourke)	Policy HOU01	On a related basis, Countryside are supportive of the provision contained in HOU01 for consideration to the specific circumstances of each site when seeking to replace existing affordable housing. This includes local infrastructure needs, local housing need in respect of tenure mix, affordability and tenure size, place-making, viability and the nature of the surrounding area. These factors are important considerations that can have a direct bearing on estate regeneration being brought forward. With regard to viability in particular, the nature of estate regeneration schemes is that they are often multi-phased and spread over a significant period of time, which makes them particularly vulnerable to economic changes through the life-cycle of the scheme. Ensuring that the policy environment is sufficiently flexible and responsive to these changes therefore is critical to ensure the continued successful delivery of estate regeneration in the borough. Any reference to a net increase in units should also be considered in the context of habitable rooms and floorspace to be applied as necessary.	This support is welcomed	No
Finchley Society	Policy HOU01(d)	We support this policy, but in practice the Council too often accept that there are exceptional circumstances.	The Council welcomes this support. Delivering affordable homes through the planning system remains complex.	No
Theresa Villiers	Policy HOU02	Disagree with conclusion in para 5.5.5 that 2 bed units qualify as family homes. Should be more emphasis on provision of houses rather than flats and also greater emphasis on garden space for new homes.	A well designed 2 bedroom home can provide 3 to 4 bedspaces. A 2 bedroom home with a minimum gross internal area of 61 to 70m2 can house 3 people while a 2 bedroom property of 70 to 79m2 can house 4. These space standards are set out in the London Plan as well as Table 9. Such well designed homes have a contribution to make to family accommodation. The Plan recognises that larger accommodation of 3 bedrooms or more remains the preferred size for family homes. Policy CDH07 sets out amenity space standards for new homes.	Yes
Finchley Society	Policy HOU02	Policy welcomed but It is not clear how it can be implemented except, say, in estate regeneration. Most developments are quite small, and what type of condition could ensure the desired mix?	Agreed. The Policy reflects priorities identified through the SHMA rather than prescriptive requirements. It therefore encourages delivery against these priorities.	No
Redrow Homes	Policy HOU02	Should specific that parts a and b are Borough-wide priorities that should be applied flexibly to individual schemes to ensure need is met at a local level. Registered providers may need flexibility to meet requirements.	Dwelling size priorities have been set based on evidence provided for the Borough, in compliance with NPPF. Parts c – f of the Policy are also considered in applying the preferred housing mix.	No
Barratt London	Policy HOU02	Housing Mix is identified for the next 5 years only but unclear whether this assessment has considered affordability, land optimisation and land availability. Therefore flexibility should be applied, it is recognised that the policy will consider 4 criteria in determining a suitable mix - viability of development is a critical determining factor and should be included. To ensure conformity with Policy H10 of the Intend to Publish London Plan, the following should be recognised in the policy and supporting text: Schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to: [inter alia] the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity, the aim to optimise housing potential on sites, Important to allow flexibility to housing mix and therefore request that paragraphs similar to 4.10.3 and 4.10.4 of the Intend to Publish London Plan are included within this policy and supporting text.	Dwelling size priorities have been set based on evidence provided for the Borough, in compliance with NPPF. Parts c – f of the Policy are also considered in applying the preferred housing mix. There is no need to repeat the wording used in the London Plan as this forms part of the development plan for Barnet and therefore need to be considered together with policies in the Barnet Local Plan.	No

Pocket Living	Policy HOU02	90% of Pocket Living are single so there is a need to include smaller compact low cost homes for first time buyers.	HOU01 makes reference to innovative affordable housing products. Residential space standards remain an important element of the Local Plan and London Plan. The Council will continue to apply these minimum standards. .	No
Mary O'Connor	Policy HOU02	Homes should provide more space for flexible use such as people working and studying at home rather than trying to make units smaller.	Policy revised to reflect bedspaces and indicate how many people could be accommodated in accordance with space standards.	Yes
Marsfield	Policy HOU02	Update to state that the dwelling size priorities and housing mix criteria of HOU02 do not apply to proposals for SOPH in recognition of the distinct housing needs of this form of housing. SOPH proposals will be expected to provide a mix of dwelling types and sizes that demonstrably address identified local needs.	Requirements can be applied flexibly if there is no need in planning terms.	No
Client interested in North Finchley TC	Policy HOU02	Whilst our client recognises and supports the need to ensure that the right accommodation is delivered to meet identified needs, they would like to emphasise that the mix proposed within a residential development should be considered on a site-by-site basis having regard to circumstances in each case. It is noted for example, that some town centre sites may not be appropriate locations for the delivery of larger family units. This should be more clearly reflected in policy HOU02.	The Council considers that there is sufficient flexibility in Policy HOU02 to apply the preferred housing mix on a site by site basis. Regard to PTAL has been added as a further criterion.	No
John Cox	Policy HOU02	There is insufficient pressure on developers to supply family-sized homes. Barnet should offer some numbers to developers as targets. You will need supporting evidence, which you can hopefully provide. Incidentally, Brent already did all this in its draft Local Plan, and I submitted a stronger formula (presumably currently being considered): "For every odd number of four dwellings included within a development, at least one must be 3 bedrooms or more. For every even number of four dwellings included within a development, at least one must be 4 bedrooms or more." That means passing the 8, 16, 24, ... dwellings levels each adds an additional guaranteed home of 4 bedrooms or more. Any exceptions you choose to grant should not apply to larger developments, otherwise you discourage wider mixed communities. In aiming for percentage housing tenure targets on individual sites you should consider relaxing targets if it allows even more family housing in return. That is because of the obvious additional cost to developers of physically larger homes, but also the huge social stress within Barnet of families desperately needing more space.	The Council considers the policy is quite clear in delivering the right homes for the next generation, setting out priorities for housing mix and how we will apply it. We expect developers to address this in their proposals.	No
Elizabeth Silver	Policy HOU02	The proposed increase in housing density and the building of small 1-2 bedroom flats, means that the younger generation in London are going to experience lower standards of living. Para 5.5.3 - Add: Most units now being built are 1-2 bedroom flats and this discourages intergenerational living. 46,000 homes (BSS01) for 60,000 population means an average of 1.3 persons per unit, ie on average for 3 housing units, occupancy is 1,1,2 people. HOU02 – Housing Mix - Add: A larger proportion of family-sized units, meaning fewer but larger units to be built, than at present. This would save on overall space and encourage intergenerational living.	The Council considers the policy is quite clear in setting out priorities for housing mix and how we will apply it. We expect developers to address this in their proposals. We expect developers to address this in their proposals. The SHMA has not identified a specific need for intergenerational living but a reference has been made to multi-generational homes as a housing option and a definition added to the Glossary.	No
Brent Cross South Partnership	Policy HOU02	Suggest additional clarity that the appropriate housing mix for developments will be assessed on a case by case basis having regard to housing typology, local need and wider delivery patterns.	The Council considers the policy is quite clear in setting out priorities for housing mix and how we will apply it. We expect developers to address this in their proposals.	No
Federation of Residents Associations in Barnet (FORAB)	Policy HOU02	Table 6 (5.5.8) indicates the assessed need by number of bedrooms. We understand the overall need for one and two bedroom properties is 38%, with the rest three bedrooms or more. But as we know, as stated at 5.5.6, that 78% of what has been built is just one or two bedrooms, and that proportion is being perpetuated. and possibly increased in anticipated schemes. Whilst two bedroom properties are being described as family homes we consider this is unrealistic as an expectation of public acceptability	The Local Plan's approach is about reflecting needs and responding to market signals. Policy therefore needs to be flexible rather than prescriptive on housing mix. Whilst the Plan recognises that a well proportioned 2 bedroom property can be considered a	No

		except for those with low incomes who will have to put up what is on offer. Indeed reality is recognised in policy HOU02(a) identifying three bedroom properties as the highest priority for market homes, though there is a complete absence of measures that might achieve this. If the desired larger homes are not going to be built what alternatives are there? Again the plan falls short on ideas. There are no robust proposal to persuade singles and couples living in family homes to downsize. So as a minimum it is imperative that the existing stock of family homes is protected. Unfortunately the Plan is inadequate on mechanisms to do this, as we discuss later.	family home it is certainly not saying that all the need for family housing can be met by large 2 bedroom homes. Through application of Local Plan policy the Council is managing and shaping growth, helping to deliver sustainable places where people choose to live and stay. This requires a balanced approach to developments. It cannot be achieved by a focus on housing quantity over quality. The approach on Housing Mix (HOU02) has a very strong link with the bespoke policy on Housing Conversions (HOU03) and protecting the existing stock of family homes. Other than providing a mix of homes where people choose to live the Local Plan has no remit to persuade singles and couples living in family homes to downsize. Such incentives fall within the remit of the Government.	
New Barnet Community Association	Policy HOU02	Policy and market are indicating need for 3+ bedrooms but AMR indicates 1 and 2 bed are dominant type. Policy should require developments of 10 or more provide mix as outlined in Table 6	The Local Plan's approach is about reflecting needs and responding to market signals. Policy therefore needs to be flexible rather than prescriptive on housing mix.	No
Redrow Homes	Policy HOU02	Amend wording of part a) to remove reference to unit sizes and replace with 'The unit mix for market homes will be based on up to date market need'	The Policy is based on evidence set out in the Strategic Housing Market Assessment (SHMA) and follows NPPF requirement to meet the needs of different sectors of the community to create strong communities.	No
Fairview Estates	Policy HOU02	Policy HOU02 sets out the housing mix for Borough. The policy requires that developments should "provide a mix of dwellings types and sizes to create sufficient choice for growing and diverse population across all households in the Borough". However, the policy then states that the Council's size priorities were for 3 bedroom properties, with 2 or 4 bedrooms a medium priority, but provides no indication of the percentage mix of 3 bedroom (high) and 2/4 bedroom (medium) in order to meet their size priorities and ensure that a mix of dwelling types are provided within the Borough. The policy is therefore unclear and cannot be considered a justified strategy/policy for the Borough. We note that the three plus bedroom units are also the units which the council considers to be high priority within Policy HOU02. Therefore the council are seeking a greater provision of three plus bedroom units to be provided across the Borough. We considered this will create problems for larger scheme with developers unable to satisfy both Local and London plan requirements. The proposed parking standards will result in additional pressures on roads within Barnet and does not comply with National requirements for sustainable development. The policy is therefore unsound	The policy on housing mix sets out the Council's priorities for the size of dwellings and enables flexibility in determining an appropriate mix on a site by site basis. Getting the mix right depends on considering a number of criteria including location, site size and mix of uses. These are clearly set out in HOU02.	No
St William Homes LLP	Policy HOU02	The Council's approach to housing mix in Policy HOU02 requires private homes to be predominantly 3 bedroom and omits any provision of 1 bedroom homes, even if they are delivered as part of a mixed development. Consideration needs to be given to a more flexible approach to those sites within town centres, where often smaller units are more suitable. Additional criterion relating to a consideration of existing mix of homes surrounding a site should be added to the preferred housing mix criteria (point's c – f of policy HOU02). This will enable the delivery of a suitable mix of homes throughout the borough.	The policy reflects size priorities as part of a housing mix. The listed criteria already consider location and surrounding context. Parts c – f of the Policy are also considered in applying the preferred housing mix.	No
Friern Barnet and Whetstone	Policy HOU02	At para 5.5.5, it is explained that in Barnet one and two bedroom homes remain the dominant type of new accommodation delivered, accounting for 78% of new homes overall and 86% of flats. "In the past a family property would traditionally consist of three bedrooms or more. Many families now live in	We are not aware of any plans to introduce a 'one child' policy under the present Government.	Yes

Residents' Association		<p>two bedroom accommodation. Well designed two bedroom properties of between 70 and 79 sq. m gross internal area can now be considered as family homes." That families are living in two bedroom accommodation, well designed or otherwise, does not mean that such accommodation can be considered as family homes- it merely means that families are living in such accommodation because true family accommodation is not available at a price they can afford – or at all. Whilst we would accept that two bedroom accommodation can be suitable for the families with one or two very young children, as time passes and those children grow older such accommodation ceases to be suitable- in fact, it becomes unsuitable. In the long term, two bedroom accommodation can only be considered as suitable for a family with one child- certainly not for a family with children of more than one sex. Is Barnet intent of pursuing a Chinese- style "One Child Policy"? Para 5.5.5 needs to be re-written to make it clear that whilst it is recognised that many families are forced to live in two bedroom accommodation, this is often from necessity and that two bedroom accommodation cannot be considered as suitable for anything but the very smallest, or the very youngest, families.</p> <p>The second sentence of Para 5.5.10 should be amended to read " There is a significant need for family sized housing of 3 bedrooms or more to be provided as part of any market housing mix" Policy HOU02- Housing Mix: A mechanism and statement as to how the policy will be applied to individual proposals is required. Compliance should be expressed as a "requirement", not an objective ("seek"). This could integrate with the "Assessed need for housing type by tenure" contained in Table 6, with worked examples and rounding up to the larger sizes. For example, a 10 unit market scheme would be required to provide 3 2 bedroom, 4 3 bedroom and 3 4 bedroom (or larger) units.</p>	<p>A well designed 2 bedroom property can provide 3 to 4 bedspaces. A 2 bedroom property with a minimum gross internal area of 61 to 70m2 can house 3 people while a 2 bedroom property of 70 to 79m2 can house 4. These space standards are set out in the London Plan as well as Table 9 of the Reg 18 Local Plan. Such well designed properties have a contribution to make to family accommodation. The Plan recognises that larger accommodation of 3 bedrooms or more remains the preferred size for family homes. This is reflected in Policy HOU02</p> <p>The Council's aspirations on securing the right housing mix are exemplified by HOU02. This policy is more detailed than the 2012 Local Plan policy. It is not prescriptive. There is no simple requirement to deliver housing in accordance with the proportions outlined in Table 6 of the Reg 18. However Table 6 acts a guide reflecting the evidence base behind the Local Plan. Officers in getting the balance right on housing mix need to consider a range of factors such as site size, context including town centre location, character, mix of uses, range of tenures, potential for custom build and community led schemes. These criteria are now set out in Policy HOU02.</p> <p>Another significant policy change is an explicit reference to monitoring. This ensures that officers in decision making are informed by the current state of play on delivery of different sized homes. The Authorities Monitoring Report (AMR) sets out how we are doing in building the right homes for the next generation. We have revised HOU02 to align with residential space standards and clarify the number of bedspaces per new home. This will be reflected in the AMR.</p>	
London Diocesan Fund (Iceni Projects)	Policy HOU02	The Council have identified a particular need for 2, 3 and 4 bedroom properties across all tenures and there is a significant need for family sized housing to be provided as part of any market housing mix. Green Belt sites are often better suited to deliver family homes which is further reinforced by the character of the surrounding area of the site. The Council's current strategy will deliver a surfeit of flatted accommodation which will not meet the needs of the Borough.	We refer to our earlier responses about our approach to housing delivery and protection of the Green Belt	No
Clive and Gill Hailey	Policy HOU02 & Para 5.5.5	When did it become permissible to describe a one- or two-bed property as being a "family home"? Our understanding is that a family home has three or more bedrooms and these are in extremely short supply!	A family can comprise of 2 adults and 1 child – hence a well designed 2 bedroom property is capable of being described as a family home.	No
Barnet Cycling Campaign	Policy HOU03	When converting existing dwellings to increase occupancy, consideration should be given to provision of adequate and affordable cycle storage.	Agree	Yes

Finchley Society	Policy HOU03	We support this and suggest the stronger 'permit' for 'support' in the second line.	Agree to change. The Council welcomes this support.	Yes
Federation of Residents Associations in Barnet (FORAB)	Policy HOU03	Of concern to us is that the one way to deliver these extra homes around town centres would be to pursue intensification by converting wholesale existing family homes within 400 metres to flats or demolishing them and replacing with new blocks of flats, which indeed the plan as drafted is encouraging. Such an approach would destroy the existing community structure and would inevitably lead to a net loss of family homes, the protection of which we have already said should be essential to maintain the stock of these homes. There would be considerable public resistance to such wholesale redevelopment and given that the vast majority of new housing is already identified for dense high-rise developments, the comparative gains from town centre intensification would probably result in overkill in the provision of small flats. The Plan should draw back on this concept.	Policy HOU03 acknowledges the contribution of conversions to the housing supply. It is a bespoke policy supported by evidence setting out the circumstances and criteria needing to be satisfied before the Council would permit conversion of a house into smaller units.. This includes an assessment of Policy DM01 at appeal and a review of other London borough approaches to residential conversions. It does not support re-development of large family houses and does seek a family sized home in the converted property.	Yes
West Finchley Residents Association	Policy HOU03	Policy HOU03 is welcomed but would like to see it strengthened by specifying a percentage of larger family homes that should be protected and that clarification on the definition of 'character' should be provided.	Policy sets a more balanced and objective way to determine conversions. Further policy guidance on approach to character is set out in Chapter 6.	No
New Barnet Community Association	Policy HOU03	400 m excessive – should be 100m from TC boundary (or 400m from a single point in TC)	The 400m threshold is used consistently throughout the Local Plan and represents a reasonable walking distance.	No
Federation of Residents Associations in Barnet (FORAB)	Policy HOU03	Residential conversions - We welcome the initiative to bring some order to this area where consistency in allowing or refusing applications for conversion has not been evident. The Policy as drafted is based on the assumption that a larger family home of 3 – 5 bedrooms may be converted to flats if 'family' sized accommodation of 74m2 or more is provided at ground floor level. This means that two bedroom accommodation would be acceptable. This is not what is said in the text - 5.6.4 says at line 8 "providing 3 bedrooms". The requirement to provide a minimum of three bedrooms should appear in the Policy. And indeed, even with this qualification we remain concerned about the implications. Housing in streets characterised by family homes, irrespective of size, have largely been protected using existing policies. But this new definition will explicitly encourage conversions in certain areas which have larger family homes close to a town centre, e.g. East Finchley, North Finchley and Underhill. These areas overwhelmingly consist of family homes and we consider it essential they should remain that way to maintain the quality of life in the neighbourhood and ensure the stock of larger family homes is not diminished. We do not understand the argument why the existing defence in DM01 may not remain and ask that it be reinstated: "Conversions in roads characterised by houses will not normally be permitted".	The Council welcomes this acknowledgement of the new bespoke policy on Residential Conversions. It is considered that HOU03 will help achieve a better balance, protecting family homes while delivering new converted homes in the right locations. The minimum size for a 3 bedroom property is 74m2. Policy has been revised to clarify this.	Yes
TfL	Policy HOU03	We are concerned that the Council will only support the conversion of larger homes where 'appropriate car parking is provided in accordance with Policy TRC03'. This again appears to set a minimum required level of car parking provision, or at least a presumption that development is expected to provide car parking. Development proposals in well-connected locations should be car-free as a starting point, with 'car-lite' provision elsewhere, and provision should not exceed the maximum standards as set out in the Intend-to-Publish London Plan. Given that this policy also states that such conversions will only be supported in areas that are well-connected by public transport and are close to town centre amenities and services, there will be less need for a car in these locations. The policy should not refer to car parking, or at least allow for lower provision by referring to the restriction of access to parking permits.	The intent of the policy is to ensure that car parking is within the required standards outlined in Table 23; however, the text has been revised to reflect the Council's support for reducing car dependency in the Borough.	Yes
Friern Barnet and Whetstone Residents' Association	Policy HOU03	The principle of Policy HOU03 is welcomed, but the draft requires amendment: Rather than "the Council will only support.." proposals where the criteria a)-c) are satisfied, the language should be firmed up-"the Council will require that... ( with consequent redrafting). Paragraph b): 74 sq.m. GIA does not constitute a "larger family sized home". See above. The minimum should be increased. 74 sq. m. is	The minimum size for a 3 bedroom property is 74m2. Policy has been revised to clarify this. Para c has also been revised. Policy has also been revised to clarify	Yes



		appropriate for a 2 bedroom property , not 3 bedrooms ( Compare with para 5.5.5 ( commented on above) The “location test” at a) is all very well, but it will encourage conversions of family homes close to town centres. We believe that the current DM01 policy has great merit and should be included in HOU03d( see below) Further , clear wording to shut out other types of proposal is desirable, such as - proposals for conversions of smaller homes (of less than 130 sq. m. original GIA) will be refused - proposals for conversions outside locations within an area falling within a) and also proposals for conversions in streets characterised by houses within an area falling within a) will be refused - in para c), additional text should be included to prescribe the minimum original area where more than 2 units are to be formed	that we will only permit those proposals that meet the listed criteria.	
West Finchley Residents Association	Policy HOU03	Demolition and redevelopment – referring to loss of larger homes replaced by smaller apartments.	The principals behind Policy HOU03 with regard to residential conversions and protecting family housing also need to be applied with re-development of such accommodation. HOU03 revised to reflect this. Cross-reference made to CDH01.	Yes
Clive and Gill Hailey	Policy HOU03 & Para 5.6	Barnet has suffered from an unacceptable number of developments where one or more lovely family homes are acquired, demolished and replaced with often badly designed Apartment blocks, usually at high-end prices. Would therefore welcome the policy if it were to be much stronger so as to prevent this type of conversion or development in roads now consisting only of houses. Must maintain the individuality & character of such roads and areas.	An acceptable balance needs to be struck between preserving the supply of family homes and increasing housing provision, and therefore densities, in more sustainable parts of the Borough. This is the aim of HOU03 which is a bespoke policy supported by evidence that sets out the circumstances and criteria needing to be satisfied before the Council would permit conversion of a house into smaller units.	No
Barnet Cycling Campaign	Policy HOU04	Proposals for student accommodation should also demonstrate that they are easily accessible by public transport, cycling and walking, particularly between the accommodation and the educational establishment.	Agreed	Yes
Mayor of London	Policy HOU04	Proposed Local Plan Policy HOU04 should make it clear that specialist older persons housing provision should be delivered in line with Intend to Publish London Plan Policy H13, including the requirement for affordable and accessible housing.	Agreed	Yes
Lansdown	Policy HOU04	There is a good evidence base underpinning the discussion of specialist housing for older persons (SHOP). Adhering to the draft London Plan targets for SHOP units will have significant benefits, including maintaining independence for the elderly for longer, releasing under-occupied housing to the wider market and reducing costs to Adult Social Care and the NHS. Although the draft Plan indicates an priority for extra care over care homes, it is important that care home applications are considered on local need as there can still demonstrably be a need for this type of accommodation in certain areas of the Borough. The alternative options for Policy HOU04 clearly would not provide a more beneficial outcome than the proposed plan.	HOU04 sets out the Local Plan approach to residential care homes.	No
LB Barnet Estates	Policy HOU04	Housing choice must also be widened to include the needs of students who may due to a disability or impairment struggle to find accessible purpose-built accommodation that meets their needs and that is located close to where they study.	Developers of student accommodation are required to meet the accessibility requirements of the Building Regulations . London Plan Policy D7 states that at least 10% of dwellings covered by Volume 1 of Part M of the Building Regulations should provide wheelchair user dwellings and the remainder meet M4(2) being accessible and adaptable dwellings..	Yes
John Cox	Policy HOU04	You consider ‘Housing Choice for Older People’ in Para 5.7.1, but nothing ends up in the Policy. Developers should be required to consider placing this type of specialist housing alongside community facilities like child nurseries and infant schools, given the strong international evidence of improved	HOU04 is clear with regard to benchmark targets, appropriate locations and providing choice for people with social care and health support needs. It includes specific reference at Part 1b to delivering older	No

		social well-being to both generations (and possibly those generations in between) from such arrangements.	persons housing in line with the London Plan (London Plan Policy H13 specialist older persons housing and Table 4.3 refer).	
Marsfield	Policy HOU04	Our specific policy comments are as follows: Remove content related to SOPH, Insert a new standalone policy to cover SOPH. This should : support the provision of 4,125 SOPH homes over the period 2021-36 (275 per annum); Define the types of housing covered by the policy (we recommend using the draft London Plan Policy H13 definition for the purposes of consistency), which should incorporate flexibility to accommodate future changes in this rapidly evolving sector; Identify qualitative site suitability criteria; cross-refer to Policy HOU01 and set out distinct requirements for affordable housing associated with SOPH: Council will seek affordable housing from SOPH developments of 10 or more dwellings. To follow the Fast Track Route applications should; Provide a minimum 35% SOPH affordable housing on-site; This can comprise up to 100% intermediate tenures (confirm that the 60:40 affordable housing tenure split defined in Policy HOU01 does not apply to SOPH) Alternatively, the Viability Tested Route can be followed: The maximum viable % of SOPH affordable housing should be provided; This can comprise up to 100% intermediate tenures; This can be provided off-site (or via financial contribution in-lieu) where on-site provision is unfeasible and/or this would give rise to demonstrable benefits Cross-refer to Policies, and note that a flexible approach will be taken to the application of these policies on a case-by-case basis taking into account the specific characteristics of the proposal.	Policy HOU04 is consistent with the London Plan and the Council does not consider a stand alone policy is merited. HOU04 sets out clear criteria for different housing choices and the separation of these different types of specialist housing will not impact the delivery of 275 new specialist older persons homes per annum. The delivery of these new homes will be monitored through the AMR.	No
Barnet CCG	Policy HOU04	Supports this policy - which recognises the need to provide a wider range of housing options for older people, reducing a reliance on residential care homes to enable people to live more independent lives for longer. Also, an increase in homes which support people with complex and nursing care needs will support a shift in healthcare 'closer to home' and reduce pressure on hospital services (paragraph 8.6.6).	Support welcomed.	No
Marsfield	Policy HOU04	In order for the Local Plan to be sound, it must include the following policy content in respect to SOPH: Support for the delivery of at least 275 SOPH per annum. In our view this should be planned for separately to other forms of specialist residential accommodation due to the scale of the need (i.e. a distinct policy); A clear definition of what types of housing are covered by the SOPH policy. This should incorporate flexibility to account for the many different types that fall within this which do not fit neatly into traditional definitions (either use class or 'product'), and which will likely evolve significantly over the plan period; Identification of sites that are suitable for SOPH; A clear policy position regarding affordable housing and SOPH that ensures the deliverability of this type of housing. This should be a distinct policy position to that which applies to general needs housing that takes account of the distinct operating characteristics and viability considerations associated with SOPH, by allowing flexibility on tenure split and/or off-site provision, in order to allow it to compete equally with general needs housing for sites; and clarity that general needs housing 'standards' (e.g. car parking, cycle parking, playspace, housing mix etc) should not be bluntly applied to SOPH where it can be demonstrated that an alternative bespoke approach would be more appropriate	The London Plan already includes a policy (H13) covering specialist older persons housing and the Council does not consider a bespoke policy is required in the Barnet Local Plan on specialist older persons housing. When such proposals come forward the Council will consider the specialist nature of the housing in terms of policy requirements set out in both plans.	No
Mill Hill Missionaries	Policy HOU04	It is therefore suggested that the figure of 275 new specialist older persons homes per annum is replicated in a standalone policy to reflect the clear need for this particular type of housing. Although London is a relatively young city, the GLA expects those aged 65 and over will increase by 37% over the next decade. Having a clear policy against which delivery in this sector can be tracked is therefore essential.	The Council does not consider a stand alone policy is merited. HOU04 sets out clear criteria for different housing choices and the separation of these different types of specialist housing will not impact the delivery of 275 new specialist older persons homes per annum. The delivery of these new homes will be monitored through the AMR.	No

New Barnet Community Association	Policy HOU04	Needs to be more creative in considering needs of over 65 population – not just vulnerable old people.	The Council's priority is for providing housing options for older people with social care and health needs. Innovative design is encouraged by the Local Plan.	No
Brent Cross South Partnership	Policy HOU04 & HOU06	As noted above, purpose-built BtR should be excluded from license requirements.	The Council does not expect genuine Build to Rent to fall under the HMO licensing regime	No
Finchley Society	Policy HOU04(2)	Add (f) 'New HMOs must comply with the Council's standards of space and accommodation.'	Agreed	Yes
Mayor of London	Policy HOU05	In line with Intend to Publish London Plan Policy H2, the borough's approach to housing design, extensions and conversions should note that local character evolves over time and will need to change in appropriate locations. In this regard, Barnet should set out where and how small sites are likely to come forward for the Council to meet its minimum small sites 10-year target of 4,340 home set out in Table 4.2 of Intend to Publish London Plan and its own commitment to deliver 5,100 homes on small sites. Town centre type uses such as health facilities, children's nurseries or education uses should be directed to town centres. Where there is a demonstrable need for these types of facilities within residential neighbourhoods Barnet should seek to re-provide or increase the residential floorspace on-site, including through extensions to the property so that a residential unit is not lost. With regards to Policy HOU05b, if a site is no longer environmentally suitable for residential use, it is unclear how it may be suitable for other sensitive uses such as a children nursery or health facility. With regards to Policy HOU05c, as stated above, the policy and supporting text must ensure affordable housing floorspace is replaced. In line with Intend to Publish London Plan Policy H8, demolition of affordable housing, including where it is part of an estate redevelopment programme, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace.	Small sites delivery clarified by Policy CDH01	Yes
Former MHNF	Policy HOU05	1a) This policy should not be allowed in Green Belt or in a Conservation area. "No inappropriate development" in the Green Belt is defined in NPPF paras 145 and 146 and we expect Barnet Council to take serious enforcement action against any potential infringements.	Applications should have regard to Policy ECC05.	No
Finchley Society	Policy HOU05	There should be something in this policy about holiday lets.	As there is a legal basis for managing holiday lets a reference in HOU05 is not merited.	No
Modomo (Modular Housing)	Policy HOU05	Remove from part 4 'Through the Local Plan Schedule of Proposals' as this is overly restrictive	Wording revised	Yes
John Cox	Policy HOU05 & GSS10	You should have a policy of no loss of social rented housing. You should collect data long-term on what housing loss happens in the borough, and of what tenure, to inform future policy. You should also encourage other council departments to monitor and document changes in levels of poverty and deprivation in redeveloped areas.	Revisions to the London Development Database enable the Council to better monitor changes to the housing supply. The Local Plan can only affect what comes forward through the planning system.	No
Mill Hill Missionaries	Policy HOU06	A clearer policy approach would be to identify enough self / custom-build sites to meet the level of need rather than rolling-forward targets onto future Development Plan documents.	Barnet's approach is realistic. Entrants on the Self-Build and Custom Housebuilding Register represent an exceptionally small proportion of Barnet's objectively assessed housing need.	No
John Cox	Policy HOU06	Given the overwhelming need for social rent homes, and the increasing numbers of approved Build to Rent developments in London with no 'low cost' rent at all, schemes are failing to meet the most pressing housing need. Your policy refers to 'London Plan Policy H13 Build to Rent', but that doesn't exist in the 'Intended to Publish' version published by the Mayor. Barnet's tenure requirements for Build to Rent developments need clarification. It would not be sufficient, for instance, to provide 100% of their 'affordable' housing as London Living Rent, and requires a significant proportion of social rent (as Southwark's viability-tested draft Local Plan does). Have you carried out a viability study on this subject?	Reference to London Plan Policy H11 has been updated	Yes

Mayor of London	Policy HOU06	The Mayor welcomes Barnet's positive approach to Build to Rent development, noting its distinctive economics and ability to contribute to the delivery of new homes. Under the Schedule of Proposals (Annex 1), Built to rent could be an option for accessible sites that are suitable for housing.	The Council welcomes this support.	Yes
National Custom and Self-build Association	Policy HOU06	Needs to demonstrate how the Plan will proactively assist self-build in line with legislation to include: Allocation of small sites specifically, Exception sites policy for self-build (less than 20 units in areas outside of settlement limits), Requirement for large sites to include self-build plots (2-6%)	Barnet's approach is realistic. Entrants on the Self-Build and Custom Housebuilding Register represent an exceptionally small proportion of Barnet's objectively assessed housing need.	No
TfL CD	Policy HOU06	Include a planning policy to promote the development of Build to Rent housing which is broadly in line with Policy H11 (Build to Rent) of the Draft NLP.	This is covered in HOU06	No
St William Homes LLP	Policy HOU06	We question the need for policy HOU06, as this merely repeats London Plan policy and therefore is not needed locally - the current preferred approach is not supported and the alternative of a 'no policy option' should be taken.	We consider that a policy on Meeting Other Housing Needs is merited given Barnet's significant housing target.	No
Environment Agency	Policy HOU07	We recommend a policy criteria is included that the site is not located in an area at high risk of flooding from rivers taking into account climate change to ensure residents and occupants are safe.	Agreed	Yes
John Cox	Policy HOU07	I disagree with you when you claim: "The Council can demonstrate that there is no objectively assessed need for pitches and plots for Gypsies and Travellers and Travelling Showpeople households.". You cannot. Your evidence base and policy have been unsoundly produced, and are likely to be fought at the Reg19 stage if you do not act more responsibly and equitably as a London borough with shared responsibilities for the city. Although not a planning issue, there have been decades of well-documented discrimination and racism against these groups from the political leadership of Barnet. You are simply perpetuating that. The earliest possible provision within the Growth Areas should occur, to allow early and stable links to be made within the wider incoming communities, and to provide early school-settlement, job and training opportunities.	Local evidence on the GTNAA has been updated, re-assessed and published.	Yes
Angie Hudson	Policy HOU07	Questions derivation and accuracy of statement in WLA report on Gypsy, Traveller and Travelling Showpeople Accommodation Assessment October 2018, that there were no Gypsies, Travellers or Travelling Showpeople identified to interview in Barnet. Representor states that she visited a site of five caravans, parked in the car park of Bethune Park in N11 on December 6th, 2019. Provides data from the Next Door App between May and December 2019 covering 'South Whetstone' citing evidence that Travellers had been resident in the borough during this seven month period and suggest that this information will also be available to the Safer Neighbourhood Team, the Courts, the local Councillors and local MP who was also lobbied for their removal.	Local evidence on the GTNAA has been updated, re-assessed and published.	Yes
Mayor of London	Policy HOU07	It is noted that the West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2018 identifies no gypsies and travellers and travelling show people in Barnet and therefore no demand for pitches. However, the 2011 census suggests there is a small population of gypsies and travellers in Barnet. It would be helpful to understand if this population is still present or if residents have moved elsewhere in London. In line with the Panel recommendation, the Mayor will initiate and lead a London-wide Gypsy and Traveller accommodation needs assessment, and will work to support boroughs in finding ways to make provision for Gypsy and Traveller accommodation. The Mayor would welcome a proactive approach to identifying potential Gypsy and Traveller sites in Barnet. Any sites that come forward in Barnet could help address the need for pitches that arises from its partner West Alliance boroughs, Brent (minimum 90 pitches), Ealing (minimum 31 pitches), Harrow (minimum 3 pitches), Hillingdon (minimum 60 pitches), Hounslow (minimum 40 pitches).	Local evidence on the GTNAA has been updated, re-assessed and published.	Yes
LB Haringey	Policy HOU07	GTTS definition from PPTS rather than Mayor's definition. Para 4.14.8 of Intend to Publish Plan refers to a London-wide needs assessment which should be taken into account if completed before adoption.	Local evidence on the GTNAA has been updated, re-assessed and published. This will be reflected in our Statement of Common Ground	Yes
Former MHNF	Table 6	We note from this table that 70% of demand in Market Housing is for 3/4/5+ bedroom properties, and in Affordable Housing it is 44% of the total. This supports our view that the number of houses needed is	The housing target is a minimum of 35,460 new homes. This is in line with the London Plan	No

		much lower than the figures suggested to house the expected population growth. 3/4/5-bedroom houses would normally have, on average, 3/4/5 occupants. However, we are concerned that unless occupancy levels are correctly evaluated in this plan, demands on necessary infrastructure will be underestimated. As an example, in the Pentavia application for 844 homes the GLA officers' report suggested that there would be only 1431 occupants. A more likely assessment of occupancy would have been as follows: Table 12 Overall Housing Mix - Unit Size Units % Mix - Studio 4 0 - 1 bed 201 33 - 2 bed 436 52 - 3 bed 123 15 - Total 844 100 Studios = 1 person, 1 bedroom = 1.5 persons, 2 bedroom = 3 persons and 3 bedroom = 4 persons. Thus, total 2225 persons. This increases the number of GPs required for example by 55%, and would have a similar impact on school places, transport needs, parking spaces etc. By allowing developers, in their applications, to quote a much lower occupancy level, the required infrastructure will be in deficit for many years to come.		
Brent Cross South Partnership (DP9)	Chapter 6	Flexibility should be applied in the interpretations of these policies to allow for site specific considerations to be taken into account, and we consider that maximum height thresholds are not necessary in order to ensure good design, and should instead be replaced by requirements for heights to be contextual and respond positively to local and wider surroundings.	It is important for the Plan to set out clear policy on building heights emphasising the strategic locations where tall buildings may be acceptable.	No
HADAS	Chapter 6	Since the light touch review of Barnet in 2007 there has been significant new work undertaken on the archaeology of Barnet and in advance of any full review HADAS considers that there is evidence that would support the extension of a number of the APA's currently identified in the plan. ( <i>detail provided in response</i> ) East Barnet, East Finchley, Galley Lane, Hendon. HADAS would be pleased to help define the extent of these boundary changes in advance of the formal review with Barnet and GLAAS to put into the Preferred Option Local Plan.	We will revisit APAs as part of the new look Local Plans proposed in the Planning White Paper This will enable consideration of new evidence on APAs produced in 2023/24.	No
Mayor of London	Chapter 6	The Mayor welcomes Barnet's opening statement in this chapter that notes as the borough grows its character will inevitably change – an important role for the Local Plan is to manage change. In addition to its design policies and Residential Design Guidance SPD, Barnet should produce design codes to bring forward development, especially on small sites. The Mayor welcomes the reference to the Agent of Change principle to protect existing residential amenity. He also welcomes the proposed approach to sustainable design and construction and the reference to the Mayor's Energy hierarchy.	Agree. Revised to clarify approach on design codes	Yes
Canal & River Trust	Chapter 6	The Brent Reservoir (Welsh Harp) has significant heritage importance within LB Barnet and is part of the industrial heritage of the London canal network. Local Plan should recognise its heritage value through local-designation and encourage development to protect and enhance its historic character. None of its structures are designated heritage assets within LB Barnet but the protection and enhancement of this waterway infrastructure is important in its own right, as part of historic transport infrastructure. Equally, so is the protection and enhancement of the spaces around it, which impact on the setting of the historic reservoir. The reservoir has a fascinating history - NPPF para 185 states Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. The reservoir would be able to support all of these aims more effectively if its historic significance was more appropriately recognised within the Local Plan. The reservoir should at least be recognised as a non-designated heritage asset within the Local Plan.	The Plan highlights the Welsh Harp.as a destination location	No
Middlesex University (Tibbalds Planning)	Chapter 6	<u>Tall Buildings</u> The University therefore welcomes the recognition within the draft Local Plan that tall buildings can form part of a strategic approach to optimising the capacity of sites which are well-connected by public transport and have good access to services and amenities, and in particular that they can become a valued part of the identity of places such as Colindale (Paragraph 6.16.2). The identification of the Colindale Growth Area as an appropriate location for tall buildings is also welcomed.	The Council welcomes this support.	No
Friern Barnet and Whetstone	Chapter 6	Whilst the draft plan contains many references to "good design", "exemplary architecture" and the like, we were unable to find any reference to "beauty". We suggest that reference should be made to the "Building Better, Building Beautiful commission report" and the draft plan then updated to incorporate	The Plan has been revised to make more references to the BBBB Report	Yes

Residents' Association		the appropriate principles. Good design may be purely utilitarian and that is not good enough for our Borough.		
Former MHNF	Chapter 6	High quality can be achieved without high cost. Emerging technology-based developments in building technology should be actively embraced in order to lower costs while improving quality. Developers must be encouraged to introduced new technologies while ensuring sustainable and distinctive design. We have already commented on Public Realm in Barnet. It is generally of a low standard, designed in order to lower price, rather than to produce an attractive design that is readily maintainable for a long life, with sustainable design which will mitigate climate change.	These issues are addressed in the Local Plan. We agree that high quality and beautiful buildings do not necessarily have to come at a high cost.	No
Elizabeth Silver	Section 6.11	Gas-fired power stations, as proposed for Partingdale Lane, do not fit in with the aim of making London a zero-carbon city by 2050. The one proposed for Partingdale Lane has a large footprint and is highly polluting (CO2); it gives off a lot of waste heat, harms the Green Belt site and disrupts wildlife.	The application 20/4241/FUL was for installation of a battery storage facility including inverter and transformer stations, battery storage containers, other associated infrastructure works, security fencing and lighting	No
Brent Cross South Partnership (DP9)	Section 6.16	The Tall Buildings Update (2019) document provides an overview of how building heights will be considered throughout the Borough and defines tall buildings as those between 8 and 14 storeys and very tall buildings as those that are 15 storeys and above. The document states "Buildings above eight storeys tend to take on the attributes of a tall building in a context such as Barnet". Borough-wide context is very broad and does not take account of local characters within the Borough, and the Growth/Opportunity Areas in particular. We support the recognition in Section 6.16 of the draft Plan that tall buildings may be appropriate in Opportunity Areas including Brent Cross, and suggest that this section recognises that tall buildings outside of the identified parameters can be acceptable where they respond positively to context (both existing and emerging).	Tall buildings are not acceptable outside the strategic locations	No
Finchley Society	Para 6.12	Because of our ageing population multigenerational developments should be prioritised by builders - there is now a strong international movement driven by AAA (Agile Ageing Alliance). There will soon be a need for young and old to benefit from living close to each other.	The Local Plan generally supports developments that are multigenerational. Reference added to Housing Chapter and definition added to Glossary.	Yes
Finchley Society	Para 6.11.3	Major development must be in line with these provisions. Money towards carbon offset should be a last resort.	This reflects London Plan policy	No
Finchley Society	Para 6.12.1	This, as with energy efficiency (6.11.4 above) may need nuancing in respect of extensions to heritage buildings.	Para 6.27.1 reflects the energy efficiency aspect of historic buildings. It also refers to the Guidance on the thermal improvements of historic buildings available on the Historic England website.	Yes
Finchley Society	Para 6.10.1	All these Supplementary Planning Documents must be updated; at present they refer to the previous Local Plan and London Plan.	The Council is committed to updating these SPDs. This is highlighted in the Local Development Scheme.	No
TfL	Para 6.14.1	Standard 18 of the Mayor's Housing SPG published in early 2016 has been superseded by the Intend-to-Publish London Plan policy T6.1 H. Disabled persons parking should not be allocated specific dwellings unless within the curtilage of the dwelling, as Blue Badge holders may not necessarily live in the wheelchair user dwellings of a development at any given point in the lifetime of the development. We suggest that disabled persons parking is dealt with solely in the transport section of the local plan.	Agreed	Yes
Finchley Society	Para 6.15.2	The penultimate sentence is an example of 'one size fits all'. There must be a place for local traditional patterns. 6.15.3 and CDH03a recognise this; the potential conflict between the two should be admitted.	This is not 'one size fits all' . There is a need for consistency in terms of design and quality as highlighted by Legible London. That does not prevent local variation.	No
Finchley Society	Para 6.15.3.	The conflict between proper public lighting and light pollution (and the cost to the local taxpayer) must be recognised, and how best to resolve it discussed.	This is a matter that should be covered by the emerging Sustainability Strategy	No

Theresa Villiers	Para 6.16	Suggest that tall buildings are redefined as five storey as there is a default acceptance of seven storeys as appropriate and this is not the case, particularly where 2/3 storey is predominant. Noting the commitment to heritage asset significance, then proposals such as the TfL 7 storey block along the A1000 at High Barnet is not acceptable.	The definition of a tall building remains at 8 storeys or more. The height of each proposal needs to be considered on its merits and there is no default acceptance of 7 storeys as being acceptable. Policy CDH04 revised to clarify this.	Yes
Finchley Society	Para 6.16.1	Why is ordnance datum thought appropriate? Some parts of Barnet are higher above sea-level than others, and it is against the local land surface that people perceive the height of a building.	Above ordnance datum has been replaced by above ground level	Yes
Former MHNF	Para 6.16.1	It is vital that these guidelines are strictly adhered to.	Support welcomed.	No
Dr P. M. Ashbridge	Para 6.16.2	After "activity", add: "but tall buildings can also remove human activity to higher and invisible levels - tending thereby to dehumanise a townscape at street level and attract security problems."	Whilst this can be true for poorly designed and situated tall buildings not necessary to revise the wording in the plan.	No
Finchley Society	Para 6.16.2 & CDH04 last para.	It is easy for developers to claim that their buildings are of exemplary architectural quality, and there should be better definition and cases cited if the refusal of applications is to be defended.	References added to National Design Code which sets out what good design means	Yes
Former MHNF	Para 6.16.3	We totally agree. This must be adhered to.	Support welcomed.	No
Barnet Society	Para 6.16.4	Welcome intention to produce an SPD on Building Heights setting out parameters for tall buildings.	Support welcomed.	No
Finchley Society	Para 6.16.4	It will be essential to have this SPD, at least in draft, by the next consultation stage, so that consultees can really assess the policy.	SPD delivery set out in the LDS	No
Former MHNF	Para 6.16.5	Why was Pentavia agreed to? Five Ways Corner is NOT an Opportunity Area, nor is it one of the designated corridors for Tall Buildings in either the current or draft Local Barnet Plan.	The Pentavia Park proposal has been withdrawn by the applicant	No
Finchley Society	Para 6.16.7	We fully agree that Barnet should be considered as a largely low-rise borough in terms of character and townscape. The presumption against developments based upon tall buildings should be maintained, except in Opportunity Areas. Well designed compact developments should be preferred to developments based upon tall buildings.	The Council welcomes this support.	No
Historic England	Para 6.16.7	– we are very pleased to see that the plan advocates a proportionality approach which encourages the delivery of denser development without resorting to a tall building.	The Council welcomes this support.	No
Former MHNF	Para 6.16.8	The diagram shows FOUR locally important views across Barnet. We have identified at least eight more inside Mill Hill alone. There must be many more across Barnet as a whole.	These cross-borough views are long established and it is important that they continue to be safeguarded. No additional views of equal importance have been identified as part of the evidence work on Tall Buildings in 2010 and the Update in 2018.	No
Barnet Society	Para 6.16.8 & Map 4	More than four views need safeguarding. In Chipping Barnet, the 360° panorama around Whittings Hill is remarkably green and unspoiled despite the proximity of extensive suburbs. Others need identifying as a matter of some urgency, ideally in conjunction with the SPD on Building Heights.	These cross-borough views are long established and it is important that they continue to be safeguarded. No additional views of equal importance have been identified as part of the evidence work on Tall Buildings in 2010 and the Update in 2018.	No
Finchley Society	Para 6.17.2	This is an unsatisfactory analysis. Permitted development must be taken as a given, which restricts the control the Council has. Obtrusive and incongruous dormers can ruin views from the rear and particularly near open space cause visual pain	This Government is encouraging greater permissiveness and the Plan has to work within these parameters	No
Dr P. M. Ashbridge	Para 6.18.1	After "flood risk", add: "and water-table problems for the roots of existing well-established trees."	Agree.	Yes
Finchley Society	Para 6.18.1	The potentially serious implications identified are there with basements that are permitted development as well.	The larger extensions are the ones that the planning system has more control over	No

Finchley Society	Para 6.19.2	This paragraph should be replaced by a more realistic one. In town centres, especially conversions over shops etc., there will not be private amenity space. Often proximity to a park is accepted as equivalent.	This reflects the Council's approach to improving the public realm in town centres.	No
Wade Miller-Knight	Para 6.19.3	Noted objection to tall buildings and provision of additional internal living space to compensate for lack of outdoor space (as this could become space for lodgers). Seems more reasonable to reduce height of buildings and only approve when there is adequate outdoor space provision.	New development should provide the minimum standard space requirement, in line with the London Plan. It will have to be demonstrated that this provision is not possible to allow alternative consideration for equivalent internal living space. The level of provision would not represent an additional room for lodgers.	No
Finchley Society	Para 6.19.3	The Plan must say what sort of a Planning Obligation will be sought, and what it may be designed to achieve.	The Planning Obligations SPD will go into more detail	No
Finchley Society	Para 6.19.5	This clear policy is supported	We welcome the support.	No
Theresa Villiers	Para 6.20	Welcome this inclusion in the Plan and further reason to reject the planning application for development at Whalebones in High Barnet.	We welcome the support.	No
Finchley Society	Para 6.20.2	First sentence. Any? Surely only ones over a certain size.	Agreed	Yes
Finchley Society	Para 6.20.3	This policy is supported.	We welcome the support.	No
Clive and Gill Hailey	Para 6.20.6	Back Land developments / garden grabbing must be prevented; access to proposed back land / garden grabs must be a planning consideration - developers must prove they have permission to access the land with vehicles, machinery and the supply of utilities over/under suitable access roads.	Refer to previous response on back land development	No
Finchley Society	Para 6.20.6	This paragraph should distinguish front and back gardens. The never-ending destruction of front gardens, turning them into car parks, must be stopped. The consequence of a dropped kerb is less parking for the general public (The enforcement of all the requirements in the Vehicle Crossover Policy is almost impossible to monitor and requires high levels of manpower.) It is now more important than ever to retain front gardens because of the effect on climate change (cf Policy ECCO1). In February 2016 the London Assembly agreed a motion promoting lawns, flower beds, rain gardens and other vegetation over paving. Artificial grass should be discouraged in front and back gardens.	Within the parameters of the planning system the Plan encourages the retention of front gardens and recognises the damage done by Vehicle Crossovers.	No
Dr P. M. Ashbridge	Para 6.20.6	Add at the end: "Infilling through the building of houses or flats on green suburban back-gardens should always be resisted."	This was already reflected in para 6.20.6.	No
Historic England	Para 6.21.2	The NPPF (paragraph 195) tells us that substantial harm or loss of a grade II listed building or Grade II RPAG should be exceptional, while substantial of or loss to a scheduled monument, registered battlefield, Grade I and II* listed buildings, and Grade I and II* RPAGs should be wholly exceptional. The NPPF goes on to say that development causing substantial harm should be refused unless the harm is outweighed by substantial public benefits. The wording in this paragraph states only that such work would be resisted takes a more relaxed view than outlined in the NPPF.	Agreed	Yes
HADAS	Para 6.21.2	The second sentence here is rather different in formulation from that in paragraphs 193 to 198 of the NPPF. It is unlikely any difference is intended, or that the Plan would be sound if it were. The sentence should therefore be reformulated or omitted and replaced by a reference to the NPPF; the wording of Policy CHD08 is appropriate and may be all that is needed. The following sentence should be added: <i>'Applications to demolish a listed building in whole or in part will be notified to the National Amenity Societies in accordance with the Arrangements for Handling Heritage Applications – Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2015).'</i>	Agreed	Yes
Historic England	Para 6.21.3	The 4 designated Registered Parks and Gardens are designated because they are of importance and possess special interest, they are not of special interest because they are designated. This section of plan does not acknowledge that significance goes beyond the grade of designation. This is a crucial	Agreed	Yes



		distinction to make and is the starting point for understanding their significance, significance is more than being designated – it is why heritage assets are designated.		
Historic England	Para 6.21.4	Regarding terminology it is convention to simply refer to scheduled monuments rather than scheduled ancient monuments; this is to reflect the fact than many scheduled monuments are relatively recent. This applies to the plan as a whole. It is also important for the policy to make clear that any applications that have the potential to impact any undesignated archaeological heritage assets should be supported by an archaeological desk based assessment. The aim of the assessment is to identify the scale and significance of the archaeological impact. An archaeological field evaluation may also be necessary.	Agreed	Yes
HADAS	Para 6.21.5	<b>Replace 3r sentence by:</b> <i>'Development proposals in these areas will be the subject of consultation with the Greater London Archaeology Advisory Service (GLAAS), who may require the attachment of an Archaeological Condition to ensure that any archaeological remains are properly investigated and where appropriate preserved. The recommendations of GLAAS will be followed. In some circumstances a major development outside Archaeological Priority Areas may merit an archaeological condition.'</i>	Agreed	Yes
HADAS	Para 6.21.6	. 'issues' in the third line should be 'assets'. Add at the end <i>'The Council has established Conservation Area Advisory Committees who will be consulted about any development proposal in a Conservation Area. The Council is reviewing the structure and operation of these committees to ensure that they operate as efficiently and effectively as possible.'</i>	Agreed	Yes
British Sign and Graphics Association	Para 6.22.2	Para 6.22.2 demonstrates a total misunderstanding about Areas of Special Control of Advertisements (ASCAs). The Council's 2006 UDP did not 'designate' an ASCA nor can ASCA designation be 'retained and revised' through the local plan process.Regulation 20ff in the 2007 Control of Advertisements Regulations specifies the procedure for ASCA orders. All ASCA orders (or amending orders) must be approved by the Secretary of State (Regulation 20(3)). The local plan system can neither create no amend ASCAs. Barnet's ASCA must remain as approved by the Secretary of State. Para 6.22.2 must be amended to state the law correctly; and, if necessary, the plan (Map 5) must be altered to show only that area which is within an ASCA approved by the Secretary of State.	Agreed.	Yes
Brent Cross South Partnership (DP9)	Para 6.3.1	Note evolution of character in growth areas as per comments on Section 2.1.	Agreed Text added to reflect that character can change as set out in Chapter 2	Yes
Finchley Society	Para 6.3.2	The Characterisation Study is ten years old. A date should be given for the next one.	There are no plans at present to revise the Characterisation Study.	No
Finchley Society	Para 6.3.5	Wording should be changed to indicate that this has happened and is happening. Following 6.3.5. there should be a paragraph here or elsewhere about the erosion of character by the proliferation of rubbish on the streets of Barnet, and what the Council is doing to combat it.	The Plan is explaining how character is eroded. It's not implying that this isn't happening in Barnet.	No
Theresa Villiers	Para 6.3.5 & 6.8.1	Agree and support these.	We welcome the support.	No
Finchley Society	Para 6.4.1	Detailed assessment of the impacts of development proposals will be based on a set of criteria that seek to ensure that the local character and existing context are reflected, . . .' There should be a commitment to produce this set of criteria by a stated date.	Such criteria will be set out in the forthcoming Sustainable Design Guidance SPD	Yes
Finchley Society	Para 6.4.4	This is too weak. It should say that developments need to aim for zero carbon.	Agreed. Text revised.	Yes
Former MHNF	Para 6.4.6	Re the 'Public Realm', It is our view that the standard of the Public Realm in Barnet is poor. The Council should develop a standards guide similar to that published by the City of London. (Supplementary Planning Document July 2016). This would improve the quality and appearance of the Public Realm, and would set a much higher standard for developers and the Council itself. We have copied below an extract from South Downs Local Plan (awarded for its environmental approach) on Sustainable Design that the Barnet Local Plan could do well to adopt.	Policy CDH03 reflects the Council's standard for public realm for new developments.	No

Finchley Society	Para 6.5.2	Second sentence is strongly supported. Visual interest must be created by active frontages. Large shopfronts must be open and not covered. There should be action against supermarkets with bland windows, and security shutters on shops that come down in the early evening and create a dead facade. Residential streets should observe the principles of overlooking with entrances, and windows, on the street frontage.	The Council welcomes this support. The Sustainable Design Guidance SPD will provide direction on these considerations.	No
Finchley Society	Para 6.8.1	Strengthen; reword the last sentence to: 'Development should not overshadow neighbouring buildings, block daylight, reduce sunlight or result in a loss of privacy and outlook.' Minimum distances for overlooking should be set, not less than at present (21m between facing habitable rooms). There should be standards for daylight and sunlight and developers should be required to show calculations.	Para 6.10.1 states "It is important to ensure that development does not significantly overshadow neighbouring buildings, block daylight, reduce sunlight, or result in a loss of privacy or outlook. Further guidance on standards affecting daylight, sunlight, privacy and outlook are set out within Barnet's suite of Supplementary Planning Documents".  It is not always possible to maintain 21 m between facing habitable rooms but adequate daylight sunlight privacy and outlook for adjoining and potential occupiers and users should be provided. Policy CDH01 clearly states "Allow for <b>adequate</b> daylight, sunlight, privacy and outlook for adjoining and potential occupiers and users."	Yes
Elizabeth Silver	Para 6.8.1	This is very important where the height of a development exceeds the height of surrounding properties.	Noted	No
Finchley Society	Para 6.8.2	Information in the Sustainable Design and Construction SPD should be set out here.	The role of SPDs is to provide more detailed guidance for the implementation of Local Plan policy. There is no need for duplication.	No
Finchley Society	Para 6.8.3	This should be more balanced. Some desirable things are inherently noisy - small children, animals, pubs, transport, church bells, shopping streets. Quiet may mean lifeless. The Agent of Change principle is admirable and should be spelt out.	Agreed. Agent of Change principle is explained.	Yes
Finchley Society	Paras 6.13.1 & 6.13.2	Submitted Plans should clearly demonstrate compliance with the policy.	It is a requirement that developments meet Building Reg Part M4(2) and M4(3) standards as set out in policy CDH02.	No
Dr P. M. Ashbridge	Paras 6.16.7 & 6.21.1	Rightly emphasises that the borough's existing character and townscape is largely low-rise, and states that the height of a new building should correspond to the existing surroundings. Also very welcome is 6.21.1, which confirms that both designated and non-designated (Local List) heritage assets are "an irreplaceable resource" and that the presumption should be that a heritage asset should be conserved.	Support welcomed	No
Former MHNF	Paras 6.3.1 & 6.3.2	We have referred earlier to a need for standards to be set as per 4.2.2 above and the recent 'Living with Beauty' guide. This may provide a clear interpretation of the standard expected, rather than the subjective assessments that occur today. The Council's characterisation study, published in 2010 is out of date and needs to be brought up to date, perhaps in support of Policy CDH02.	Plan has been updated to reflect the BBBC work. There are no plans to revise the Characterisation Study.	No
Finchley Society	Paras 6.6.1 & 6.7.2	The space standards expressed are an absolute minimum. Expressing space in terms of m2 only does not necessarily lead to good design and useable flat plans meeting the requirements of a variety of household types over time. Lifetimes home standards should be reintroduced using as they do the spaces around furniture needed.	Space standards are a requirement and an important contributor to delivering good quality accommodation. It is accepted that they are not the only contributor. We note that there are no references to Lifetime Homes in the London Plan	No

Elizabeth Silver	Paras 6.9.1 & 6.11.5	The Pentavia Park proposal is inappropriate in massing, scale and height, overlooking surrounding 2-storey houses and their gardens.	The Pentavia Park proposal has been withdrawn by the applicant	No
TfL CD	Policy CDH01	Suggest that paragraph iii should also refer to Healthy Streets.	Agree	Yes
Environment Agency	Policy CDH01	Although part (b) makes reference to the Sustainable Design and Construction SPD, we think the policy could be improved by providing a more explicit reference to ensuring high-quality design for the natural environment. For example, the policy could state 'Apply the requirements of the Sustainable Design and Construction SPD to ensure the local environment, biodiversity, water management and sustainable drainage measures are incorporated.'	Revise CDH01b	Yes
Elizabeth Silver	Policy CDH01	In dense developments, very good sound insulation between flats is paramount. Hearing one's neighbours' conversations and their daily tasks, can really affect residents' mental health. For the same reasons, it is important that bedrooms and living rooms have some green space or trees to look out onto. Residential density should consider capacity of infrastructure.	Sound insulation is addressed through Building Regulations.	No
St William Homes LLP	Policy CDH01	The approach to deliver optimum density as set out in policy CDH01 'Promoting High Quality Design' is supported.	Support welcomed.	No
Marsfield (Avison Young)	Policy CDH01	We support the requirement for residential development to make the most efficient use of land by delivering optimum densities and that the consideration of densities should be design led. We note that this is reflective of policies on residential densities in the 'Intend to Publish' version of the London Plan, and is critical in providing sufficient housing to meet the Borough's identified needs.	The Council welcomes this support	No
Landowner at 360-366 Burnt Oak Broadway, (Avison Young)	Policy CDH01	We support the requirement for residential development to make the most efficient use of land by delivering optimum densities and that the consideration of densities should be design led. We note that this is reflective of policies on residential densities in the 'Intend to Publish' version of the London Plan, and is critical in providing sufficient housing to meet the Borough's identified needs.	The Council welcomes this support.	No
Fairview Estates	Policy CDH01	Fairview also consider that a number of the draft policies have also not been positively prepared and are unsound. CDH01 sets out a design-led approach will determine the capacity of a site rather any prescriptive density standards. We support the principle that the Council should seek to optimise sites and consider a range of design led elements when considering the capacity of a site. However, considerations of the local context and existing building form should only have a limited influences on the design of building and should never be the sole reason for reducing the size of a development. The emerging Local Plan should also recognise that areas should be allowed to evolve and development in order to meet local need and maximise the use sustainable infrastructure. New developments which move away from traditional/historic housing styles are necessary for this and to allow sites to be optimised. New developments can also provide a greater range of dwellings which meet local needs. The emerging plan should recognise that the design led approach will ensure that the maximum number of dwellings will be delivered on site in order to address the Boroughs housing need and growth will not be unnecessary limited because the proposed development do not accorded with existing typographies.	The Local Plan supports the requirement for residential development to make the most efficient use of land by delivering optimum densities and that the consideration of densities should be design led. High quality design solutions help to make new places that can make a positive contribution to existing suburban character.	No
Former MHNF	Policy CDH01	We have already commented on the real need for objective evaluation of "Good Design". We should not get buildings such as shown below built in a Conservation area, in Green Belt. This could be an office block or warehouse almost anywhere, rather than something of distinctive design that will look good for many years to come, and be easier to sell/rent!	The Plan has the policies in place to support high quality design solutions help to make new places that can make a positive contribution to existing suburban character.	No
Brent Cross South Partnership (DP9)	Policy CDH01	Paras 6.6 - 6.8 (Tables 9 and 10) set out specific guidance and details for housing standards. We note that the detail within these tables are dealt with in national and regional policy and query whether they need to be replicated here. Notwithstanding, clarity is sought on the source of the standards in Table 10.	Barnet's requirements set out in Table 10 are consistent with those in the London Plan (Policy D6 Housing quality and standards). Any changes to the	No

			standards set out in the London Plan or the SPGs will be applied to development in Barnet.	
Sport England	Policy CDH01 & 03	Should include reference to Active Design	Agreed	Yes
Geoffrey Silver	Policy CDH01 (b)	This is a good policy, but opposite Mill Hill East station it is ignored, as current developments there are completely out of character, even ugly, being much denser and higher than anywhere else in Mill Hill, including all other recent developments. (This example is reminiscent of the Pentavia Retail Park proposal which Barnet disapproved of).	Mill Hill East is widely considered as an example of good suburban growth supported by the Area Action Plan and Design Code	No
Finchley Society	Policy CDH01(a)	Despite the removal of the matrix from the draft London Plan 'optimum density' must have some criteria. Otherwise it provides an open door for developers, and refusals could not be defended on appeal. Over-density must be a valid ground for refusal of a planning application.	The new London Plan sets out a design-led approach to optimising site capacity, responding to factors such as site context and infrastructure. The Mayor's emerging Good Quality Homes SPD provides detailed guidance on site analysis and provides a range of residential types to test design capacity. The sites identified in the Sites Schedule will undergo a design-led approach to capacity at the masterplanning or application stage.	No
Finchley Society	Policy CDH01(b)	To be an adequate design code to meet the requirements of the London Plan the Residential Design Guide SPD and the Sustainable Design and Construction SPD must be fully up-to-date. They should be revised before the new Plan is adopted.	The Council will, prior to adoption, start producing a new Sustainable Design Guidance SPD to replace and update the content of the 2 SPDs.	Yes
Finchley Society	Policy CDH01(v i)	'adequate' should be defined; there should be standards for daylight and sunlight and developers must show their calculations.	Para 6.10.1 states "It is important to ensure that development does not significantly overshadow neighbouring buildings, block daylight, reduce sunlight, or result in a loss of privacy or outlook. Further guidance on standards affecting daylight, sunlight, privacy and outlook are set out within Barnet's suite of SPDs".  It is not always possible to maintain 21 m between facing habitable rooms but adequate daylight sunlight privacy and outlook for adjoining and potential occupiers and users should be provided. Policy CDH01 states "Allow for adequate daylight, sunlight, privacy and outlook for adjoining and potential occupiers and users."	No
Ropemaker Properties (Barton Willmore)	Policy CDH01, TOW02 & ECC02	Policy and supporting text on agent of change is not aligned to London's Intend to Publish Plan. Definition in London Plan should be incorporated to address both future as well as current operation of sites (ie. as it may evolve with or without the need for planning permission).	Text revised to reflect London Plan when published	Yes
Barnet Society	Policy CDH02	The simplest way of reducing the very substantial environmental impact of new construction is to minimise demolition and new building. Instead, the Council should encourage retention and adaptation of existing buildings wherever practicable.	Agree – add reference in para 6.11.1 to the desirability of retention and adaptation of existing buildings wherever practicable.	Yes
Finchley Society	Policy CDH02	Uses the terms 'must', should (be)' and 'required' in different places. The terminology should be 'must', with any need for flexibility indicated where appropriate.	National policy sets the limits for planning terminology as part of a flexible and responsive planning system. As part of Reg 19 we have ensured a consistency check of the Plan	No

Barnet Society	Policy CDH02 & ECC01	This policy, Policy ECC01 (Mitigating Climate Change) and related draft Policies are well-intentioned but do not go far enough. For example, although there are statements about carbon reduction they refer entirely to emissions in use, there is no mention of the equally important need to reduce embodied carbon. Nor are many meaningful standards set with regard to energy, emissions or waste and the only reference to promoting a circular economy is a reference to Policy S17 in the London Plan.	Text amended	Yes
Finchley Society	Policy CDH02e	It should be recognised that compliance may sometimes be difficult, and there may sometimes be a conflict with e.g. environmental desiderata. The Design Statement should deal with these problems fully and openly.	This should be addressed by the Inclusive Design Statement	No
Finchley Society	Policy CDH02f & g	Compliance with these rules requires enforcement during construction. The Council must commit the necessary resources.	This is enforced through Building Regulations inspection visits	No
Environment Agency	Policy CDH03	Consistent with comments to GSS08, we think this policy should be further improved by including 'sustainable drainage systems' as one of the development features to be achieved. For example, part (a) could read as follows: Relate to the local and historic context and incorporate high quality design, landscaping, planting, street furniture and surfaces, including green infrastructure and sustainable drainage provision.	Agreed	Yes
Barnet Cycling Campaign	Policy CDH03	Support the use of Healthy Streets Indicators, but policy needs to set minimum acceptance criteria for healthy streets scores. Our assessments show that Barnet performs poorly compared to most of its neighbouring boroughs. It comes 28th out of 33 and could improve greatly by introducing Low Traffic Neighbourhoods, protected cycle tracks and widespread 20mph speed limits and CPZs.	Part b of the policy already states that proposals should be designed to meet Healthy Street Indicators, promote active travel and discourage car use.	No
Finchley Society	Policy CDH03	Say 'development proposals must:'	Planning needs to be flexible therefore 'should' remains our preferred term	No
Finchley Society	Policy CDH03c	'Meanwhile' occurs several times in the document; it is not generally understood, and there should be a reference to the Glossary.	Agreed. Definition added on Meanwhile uses	Yes
Environment Agency	Policy CDH04	A policy requirement should be included to reflect this, so that substantial green buffer zones are provided where tall buildings are located adjacent to rivers to protect and enhance the river corridor habitat. It should also specify that artificial lighting should be directed away from the river corridor to ensure wildlife are not adversely impacted.	Agreed – Text and CDH04 revised.	Yes
Landsec	Policy CDH04	The classification of tall buildings as being between eight and 14 storeys is overly restrictive. Eight storey buildings are not uncommon in a borough like Barnet and the GLA considers tall buildings to be of 30m or higher (approximately 10 storeys). Major thoroughfares should be considered as appropriate locations for very tall buildings (over 14 storeys), as well as tall buildings	Barnet's definition remains at 8 storeys or more and reflects the suburban character of the Borough.	No
Fairview Estates	Policy CDH04	Policy is basically unchanged from the adopted plans approach and sets out the specific areas where tall buildings will be considered appropriate. The policy does not provide flexibility for tall buildings to be permitted on appropriate sites outside these areas. There is no undated analysis of a Borough which has experienced change. This policy fails to provide sufficient flexibility to allow sites outside the areas listed to optimise their capacity through the use of tall buildings. Council has also recently granted permission for tall buildings on sites outside of these areas (19/4661/FUL Hyde Estate Road and H/01054/13 Hendon Waterside Development) which demonstrates that the current prescriptive approach is insufficient to meet the needs of the Borough. The policy is therefore not consistent with national policy by not allow sites to be optimised to provide their maximum number of units and can already be seen to be inappropriate for development from recent decisions.	CDH04 is a sensible and appropriate approach guiding the location of tall and very tall buildings in Barnet. The Council will not support any tall buildings outside of the locations identified in Policy CDH04.	No
Finchley Society	Policy CDH04	add at end 'and it is not reduced to less than the amenity space minimum in this Plan.'	Tall buildings are not exempt from delivering the standards set out in this Plan.	No
Ropemaker Properties	Policy CDH04	Policy should focus development at locations that are well connected by public transport and have good access to services and amenities such as Garrick Road Industrial Estate and is also conflicting by setting height ranges when CDH01 emphasises a design-led approach.	Garrick Industrial Centre is safeguarded as LSIS in the Local Plan. It is necessary to set parameters for tall buildings in the Local Plan	No

Brent Cross South Partnership (DP9)	Policy CDH04	Suggest removing maximum height level (28 storeys) and allowing for heights that respond positively to context (both existing and emerging) including local and strategic views.	Agreed	Yes
Mayor of London	Policy CDH04	The Mayor welcomes the inclusion of definitions for tall buildings and very tall buildings in its draft Local Plan and the identification of areas that are most suitable for tall buildings as well as very tall buildings. These correspond with the growth area policies. As some of the proposed locations may be linear along a high street, the policy should also ensure that development does not result in a canyon effect that can result in, or exacerbate poor air quality. It would be helpful if Map 4 showing local views also shows the areas that are most suitable for tall buildings so that the local views can be taken into account, especially where SPDs and masterplans are being produced.	Map 4 has been revised.	Yes
Historic England	Policy CDH04	there is some concern that important strategic issues such as the parameters for tall buildings will be set in an SPD, which does not form part of the development plan, and not in the local plan itself. In our view these parameters are integral to the strategic delivery of the plan and guidance should be included in the plan. Notwithstanding this, we welcome part iv in relation to heritage. We are also pleased to see that this policy makes reference to our guidance on tall buildings and the Borough's Characterisation Study.	Through SPD there is an opportunity for more detailed design work around parameters which supplements CDH04 as well as proposals in Annex 1. Sites in strategic locations where tall buildings may be appropriate have been identified. The Council welcomes this support.	Yes
Barratt London	Policy CDH04	Supports the general approach and locations identified, however concerned that the generic approach may not reflect the actual housing capacity at each site and planning permissions already obtained from the Council. It is recognised that tall buildings that exceed these heights will not be permitted unless exceptional circumstances can be demonstrated, such as appropriate siting within an Opportunity Area, however it is unclear why special circumstances are required. It may be more prudent to require very tall buildings to meet certain design criteria.	CDH04 has been revised. The onus is on the applicant to demonstrate exceptional circumstances sufficient to warrant a departure from the policy wording.	No
Federation of Residents Associations in Barnet (FORAB)	Policy CDH04	CDH04 is almost wholly concerned with the parameters for tall building within the areas where they are considered to be appropriate, whilst saying nothing about the rest of the Borough other than the implication that as a tall building is defined as 8 storeys or more, up to seven storeys will be the default for what is acceptable elsewhere. The London Plan says at 3.8.2 that "tall buildings are those that are substantially taller than their surroundings and cause a significant change to the skyline". This is a clear statement that could be used to protect low rise areas and something along these lines should be in the Local Plan tall buildings policy. Further, the London Plan offers flexibility to tailor what height is acceptable in specific locations, which indicates that the Barnet blanket definition of tall buildings as eight storeys or more applying across the Borough is far too rigid. We have large areas where there is little or nothing above 2/3 storeys and here five, six or seven storeys would clearly be considered a tall building. We suggest the default position should be that a building of five storeys or more would be considered as tall except in defined areas where variable higher limits could be set. We are also aware that in many localities developers have used the pressure to include more affordable housing as a reason to increase the height of buildings way beyond what was initially agreed. Such a situation is currently in discussion in relation to the New Barnet gas works site. We are alarmed that it has proved so easy for developers to press for much taller buildings in areas where they are at odds with the surroundings. So we ask for a statement in the policy that the maximum height allowed for particular areas may not be varied.	CDH04 revised to make clear that definition of a Tall Building and identification of strategic locations where tall buildings may be appropriate does not mean that all buildings up to 8 storeys or to a height of 26 metres are acceptable in these locations or elsewhere in the Borough. Such proposals will be assessed in the context of other planning policies, in particular Policy CDH01 – Promoting High Quality Design, to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area	Yes
LB Brent	Policy CDH04	The Council is supportive in principle to the approach to tall buildings as set out in this policy in terms of their potential impact on Brent borough. A key element for it however is clarity on the boundary of opportunity areas. It is noted that there is a different approach to sites within opportunity areas and those outside in terms of maximum heights considered appropriate. Clarity on the boundary of opportunity areas along Edgware Road associated with this policy is needed. Whilst the draft London Plan contained opportunity area boundaries in one of its diagrams (Figure 2.8), it is for borough plans to define the extent of the boundary. The draft Local Plan consultation document does not provide clarity	Reg 19 provides clarification on boundaries of Growth and Opportunity Areas This will be reflected in our Statement of Common Ground	Yes

		on this matter. The key diagram for instance, although it is understood it is an indicative high-level plan, in relation to Colindale shows the opportunity area well away from Edgware Road, focussed on the major sites contributing to its housing target, such as the Public Health England site. Nevertheless, the site-specific proposals for McDonalds and for Burger King identify their location as within the Colindale opportunity/growth area. For Brent Cross/ Cricklewood Opportunity Area, the Barnet key diagram shows small parts of Edgware Road within the boundary, whilst the draft London Plan boundary contains all of Edgware Road between the north circular road and Cricklewood. Again clarity on this should be provided. The Council would appreciate early engagement on the proposed Buildings Heights supplementary planning document, in particular where it relates to areas where more detail is provided on sites that adjoin the borough boundary. Provide clarity on the boundary of the opportunity areas, particularly along the Edgware Road.		
Former MHNF	Policy CDH04	Tall Buildings policy must be enforced without fear of local decisions being overturned by The Mayor of London or The Secretary of State. Otherwise the public will lose faith in the planning system, and believe they are powerless to influence outcomes. This was not the desirable outcome of the Localism Act 2011, nor is it in tune with the fine words of successive Ministers since. Local means LOCAL not City Hall, and the Town Hall needs to listen to people who actually live locally to a development, and not give weight to the opinions of outsiders, who perhaps have a vested interest, but do not have to live with the consequences of bad decisions.	The Council is required to produce a Local Plan and make planning decisions within the parameters of the planning system as legislated by Government. Barnet's Local Plan must be in general conformity with the London Plan which legally forms part of Barnet's Development Plan.	No
TfL (CD)	Policy CDH04	Do not support the definition of 'tall' and 'very tall' buildings which do not accord with Draft NLP policy D9 (Tall Buildings) which states that the definition of a tall building should be based on specific localities and that the height ranges should vary by local context. It is unclear what might constitute 'exceptional circumstances' and a design-led approach would be more appropriate, in accordance with Draft NLP policy D9.	The Council refers to the Mayor's positive response on CDH04. The Council will not support any tall buildings outside of the locations identified in Policy CDH04. The Council is developing a Building Heights SPD to guide proposals and ensure building height is located appropriately	No
Former MHNF	Policy CDH04	The Tall Buildings policy is fine so long as it is properly adhered to.	The Council welcomes this support	No
Land owner 360-366 Burnt Oak Broadway, (Avison Young)	Policy CDH04	We welcome the support for tall buildings as appropriate along Major Thoroughfares (to include the Edgware Road/A5) and note that these policy objectives will facilitate compliance with other policy objectives of this Draft Plan, for example making the most efficient use of land and delivery of optimum densities.	The Council welcomes this support.	No
Client interested in North Finchley TC	Policy CDH04	Our client is supportive of Policy CDH04 which is in line with the adopted SPD and the requirements of national policy and the London Plan which seek to optimise density in town centre locations that are well served by public transport facilities.	The Council welcomes this support.	No
Harrison Varma Ltd (Savills)	Policy CDH04	The in-principle support for tall buildings (8 to 14 storeys) on the Major Thoroughfares is welcomed. This approach can support the optimisation of sites in these locations and especially in close proximity to transport nodes in order to intensify development. For consistency, Policy GSS11 should be altered to make clear that buildings taller than the existing neighbouring context can be acceptable; appropriate design can ensure that increased height can be achieved in the context of a lower existing context.	The Council welcomes this support. The emerging Building Heights SPD will enable the Council to provide clear design guidance for proposals for buildings.	Yes
Mary O'Connor	Policy CDH04	Tall buildings should be defined as above 6 floors and only permitted in Brent Cross	The definition of 8 storeys or more remains in place from the 2012 Local Plan as does the identification of strategic locations where tall buildings may be appropriate.	No
New Barnet Community Association	Policy CDH04	Tall buildings 5 storeys and above given the predominate 2/3 storey existing character and only accepted in designated growth areas	The definition of a tall building at 8 storeys or more was established by the 2012 Local Plan. The strategic locations highlighted in CDH04 are the places in Barnet where tall buildings may be appropriate.	No

Mr L. Barnor	Policy CDH04	My comments are that West Hendon is too built up now and does not have the transport infrastructure for more high rise developments . Also West Hendon is prone to flooding and especially on the junction of Goldsmith Ave and the Hyde going down to Sainsburys. There needs to be less high rise buildings and I suggest that they are limited to no more that 5 floors high and that there is adequate car parking provision.	The definition of a tall building at 8 storeys or more was established by the 2012 Local Plan. The strategic locations highlighted in CDH04 are the places in Barnet where tall buildings may be appropriate. The Council is committed to the delivery of sustainable and active travel and proactive in promoting travel behaviour modal shift and a reduction in car parking provision.	No
Mr Walker	Policy CDH04	Please register my objection to the plans as they stand. This is notwithstanding the positive arguments in favour. The main objection is the tower planned is far too tall and out of keeping with the neighbourhood. This is a residential suburb and not central London. The other main reason is that this does not have the consent of the majority of local people and therefore would not be a democratic decision.	The definition of a tall building at 8 storeys or more was established by the 2012 Local Plan. The strategic locations highlighted in CDH04 are the places in Barnet where tall buildings may be appropriate. As part of the planning process comments can be made on planning applications.	No
Friern Barnet and Whetstone Residents' Association	Policy CDH04	Policy CDH04 should be amended to make it clear that the statement at para 6.4.1 applies to the consideration of proposals for tall (and very tall) buildings- "The Council will not approve designs for new development that is inappropriate to the local character" Para 6.16.5 states that proposals for "Very Tall" buildings will not be supported outside Opportunity Areas. This needs firming up- "will not be permitted "would be better. .The various references to "above ordnance datum" seem misconceived- surely the appropriate reference point is "above local ground level"? A "tall building" is defined as one of 8 or more storeys and CDH04 is intended to protect against inappropriate development of such structures. However, a building of less than 8 storeys may be inappropriate in many locations and we suggest that this needs covering in the express policies. We propose that Policy CDH01, which already recognises the relevance of height, should be firmed up along the lines of para 6.4.1 quoted above.	CDH04 has been 'firmed up'. Revisions include highlighting how proposals will be assessed. This includes character. AOD removed and cross-reference made to CDH01.	Yes
Barnet Society	Policy CDH04	Share FORAB's concerns about the application of this policy in predominantly low-rise neighbourhoods. In many parts of Chipping Barnet, blocks of 6-7 storeys would seriously intrude into views from nearby open spaces and the Green Belt. Green 'lungs' that separate neighbourhoods and give them identity are particularly vulnerable in this respect. Cases in point are TfL's proposed row of slabs lining Barnet Hill, blurring the distinction between the hill-top settlement and the low-rise suburbs of Underhill and Oakleigh, and Fairview's blocks looming over the tree-tops of Victoria Recreation Ground.	See response above to FORAB	Yes
Aberdeen Standard Investments (Lichfields)	Policy CDH04	Requiring "exceptional circumstances" to be demonstrated, in order to permit Very Tall buildings, is not in compliance with the emerging new London Plan which promotes a design-led approach. Reference to "exceptional circumstances" should be removed and that part (b) of the policy should be amended to include similar criteria as outlined under Policy D8 (Tall Buildings) of the draft New London Plan. In addition, both part (b) of the policy and Para 6.16.5 infer that the Edgware Growth Area is not a suitable location for Very Tall buildings, instead directing them to Opportunity Areas. This approach is not considered to be reflective of the highly accessible location, the site potential, and the context of the 17 storey Premier Place scheme. Request the following text amendments: CDH04 - " <i>Tall buildings that exceed these height limits ('Very Tall') will not be permitted unless exceptional circumstances can be demonstrated, such as appropriate siting within a <u>Growth Area</u> <del>an Opportunity Area</del></i> " Para 6.16.5 – " <i>Buildings that are Very Tall (exceeding 14 storeys (46 metres or more AOD) will not be supported unless there are exceptional circumstances to justify their siting in <u>Growth Areas</u> <del>Opportunity Areas</del> which are areas of extensive change. Proposals for Very Tall buildings will not be supported outside of <u>Growth Areas</u> <del>Opportunity Areas</del></i> ." The reference at para 6.16.7 that " <i>the principle of proportionality should apply, whereby the height of the building corresponds to the existing surroundings</i> " is considered	The Mayor is supportive of CDH04. Policy has been revised to be more consistent with London Plan Policy D9.	No



		to be over-simplistic and does not include sufficient flexibility to account for the individual circumstances of different sites.		
Barnet Society	Policy CDH04	A critical point not addressed in the Policy is the detrimental effect of tall buildings sprinkled across the borough. One of the pleasures of parts of Barnet is the illusion of countryside. The upper Dollis Valley is a good example, where only Barnet House and Angle House currently interrupt the green horizon. If additional towers are allowed to straggle randomly along the A1000, this effect would be destroyed. It would be better to designate locations where clusters of tall buildings would be permitted, with substantial distances between clusters.	Many of the strategic locations where tall buildings may be appropriate were identified in the 2012 Local Plan and it is recognised that tall buildings are now a more prominent feature in Barnet in 2021. CDH04 is a more detailed policy than in 2012. It references impact on views and the skyline.	Yes
Barratt London	Policy CDH04	The Draft Local Plan provides 'Alternative Options', including the proposition to 'Retain existing policies (DM05 & CS05)'. Strongly oppose any possibility of retaining the existing policies due to their approach to limiting tall buildings to simply eight storeys. Such height restriction to development stymies making the most efficient use of land.	The Local Plan approach to tall buildings is not inconsistent with that of the 2012 Local Plan and the definition of 8 storeys or more remains in place. The Plan is responding to more recent pressures for much taller buildings.	No
St William Homes LLP	Policy CDH04	To fully support the approach of location of tall buildings (Policy CDH04), district town centres should be added, whereby it can be demonstrated there is no detrimental impact; tall buildings should not just be restricted to the town centres of Finchley Central and North Finchley if the Council intend to deliver the most efficient use of land and adopt an optimum density approach to development.	The Reg 18 identified new strategic locations where tall buildings may be appropriate including the A5 and A1000 as well as the New Southgate Opportunity Area.	No
Redrow Homes (Avison Young)	Policy CDH04	Part c reference to maximum height of 28 storeys is not included in the evidence paper	This threshold has been removed	Yes
Barratt London	Policy CDH04	Concerned that an arbitrary maximum limit of 28 storeys (equivalent to approx 70 metres AOD) has been applied to tall buildings in this policy. This is not considered a sound approach and one based upon empirical evidence and should be deleted.	This threshold has been removed	Yes
Elizabeth Silver	Policy CDH04	The tower blocks built in the 1960s were unsuccessful social experiments. It is unclear how these new Tall Buildings/ tower blocks will be any better. In tall buildings the only way into a flat is via a lift or a very long flight of stairs. The very long flight of stairs in a tall building is an unsuitable route for most people. If there is a pandemic such as coronavirus, there is no way for people to enter or exit their flats in such a building, without encountering a contamination risk. So reducing risk for older people would mean true isolation and confinement, in itself a health risk. A much safer solution is to build no higher than four stories, with an external (metal) staircase to be used in case of fire or widespread infections."	Well designed and safe tall buildings have an important role to play in delivering new homes. The Local Plan will only consider tall buildings in specific locations.	No
Clive and Gill Hailey	Policy CDH04 and Para 6.16.1	Our family live in East Barnet - a delightful suburban area which is almost entirely consisting of one- or two-storey low-rise buildings, with a very few three-storey. There are just two blocks of flats in East Barnet Village. Therefore, the proposed definition of "Tall Buildings" is clearly not appropriate for this area. For those people living in a bungalow (of which there are many!) or in a typical suburban family house, a four-storey building would be described as and considered to be "Tall" and it would be overbearing and would overwhelm the existing character and amenity of the area. The Plan's definitions must reflect the specific aesthetics of each individual suburban area outside the designated strategic growth locations and must define "Suburban Tall" buildings as being four or more storeys. Buildings of more than three storeys must be refused unless within strategic growth areas.	Recent government changes to permitted development may allow existing buildings to add two additional storeys. The definition of a tall building at 8 storeys or more was established by the 2012 Local Plan. The strategic locations highlighted in CDH04 are the places in Barnet where tall buildings may be appropriate. East Barnet Village is not one of them.	No.
Finchley Society	Policy CDH04a	We disagree that the town centres of Finchley Central and North Finchley are suitable for tall buildings up to 14 storeys. These are areas of dense low-rise buildings in which tall buildings will be isolated eyesores. There is a growing collection of buildings in these locations in the 5 to 7 storeys range, and policy should be to limit new developments to a maximum of 8 storeys. Individual buildings up to 14 storeys would be incompatible with Policy GSS08, particularly 'a) achieve a high-quality design that enhances the visual amenity of the town centre.'	The 2012 Local Plan established both these town centres as strategic locations where tall buildings may be appropriate. Design safeguards are in place in the Local Plan to ensure that such proposals integrate with the urban fabric and enhance the visual amenity of the town centre.	No

Finchley Society	Policy CDH04a	We fully support this policy. No building of over 14 storeys should be permitted outside an Opportunity Area. This restriction should be absolute and strictly enforced so that there is no ambiguity for developers.	The Council welcomes this support.	No
Finchley Society	Policy CDH05	<p>Items d,e,f and g must be quantified. Why not adopt the standards for new development?</p> <p>d) Maintain an acceptable outlook and adequate spacing between any surrounding buildings.  e) Retain satisfactory amenity space.  f) Avoid adverse impacts on the sunlight/daylight to neighbouring properties.  g) Maintain or improve the appearance of the locality or street scene.</p>	<p>As stated in para 6.19.3 Policy CDH05 applies to ALL extensions, commercial, public as well as residential uses. The Policy highlights that context and local character are key considerations in the design of extension development and there should be no significant adverse impact on the amenity of neighbouring properties.</p> <p>CDH05 on Extensions is relevant to existing developments and not new developments or new builds. In case of residential extensions Barnet's Residential Design Guidance SPD provides a clear and consistent message on how we manage change within Barnet's suburbs. The SPD focuses on improvements to the existing housing stock including extensions and provides more detailed residential design guidance on new developments and standards required.</p> <p>The council recognises that achieving design quality is an important part of good planning. Every development is generally different in size, context, type and nature but the underlying principle is that the development needs to be designed to ensure it functions well, is pleasing to the eye and it endures. The council will, therefore, not accept design that is considered inappropriate to its context or which fails to take opportunities to improve the character and quality of an area and the way it functions.</p>	Yes
Former MHNF	Policy CDH05	With regard to extensions, we are concerned about the conversion of garages into habitable space, where this then reduces parking space causing overspill on to the public highway. We understand that for many the garage is no longer for parking a car but is a much-needed storage area. Further, we do believe that where front gardens are used for parking, the paving must be permeable and at least a third of the garden area must be retained. If not, the street scene will be damaged for ever. Dropped kerbs provide access to owners' property but do not necessarily increase parking, as on street parking is reduced. As such, agreements to such changes should be made only when all consequences have been fully evaluated.	These are issues covered by permitted development, the remit of which is increasing as the Government wants greater relaxation of planning rules in order to enable delivery of more homes.	No
Friern Barnet and Whetstone Residents' Association	Policy CDH06	Policy CDH06, Basements is welcomed, but c) should be extended to expressly require that there is no demonstrable adverse effect on neighbouring properties, not merely on groundwater conditions.	Existing design guidance on basements will be updated in a new SPD on Sustainable Design Guidance. This will consider any new good practice on development (including basements).	No
William Taylor	Policy CDH06	Highlights the issues that can be caused by basement extension works including noise, traffic, disruption and in some cases structural damage to neighbouring buildings. Has suggested following the	Existing design guidance on basements will be updated in a new SPD on Sustainable Design	No

		approach taken by other councils to provide a Planning Advice Note (eg as Richmond have done - 'Good Practice Guide on Basement Developments') that can be referenced in the Plan.	Guidance. This will consider any new good practice on development (including basements).	
Thames Water Utilities (Savills)	Policy CDH06	Supportive of the policy, but request that it is strengthened by requiring all basement development to incorporate a positive pumped device or other suitable flood prevention device to avoid the risk of sewage backflows which can cause sewer flooding. This would ensure compliance with NPPF and good practice as recognised in Part H of Building regs.	We welcome support. The emerging Sustainable Design Guidance SPD is the best platform for setting out such technical requirements	Yes
Mayor of London	Policy CDH06	The Mayor welcomes Barnet's proposed policy on basement development in order to protect residential amenity and the local environment.	We welcome the support	No
Former MHNF	Policy CDH07	Amenity space is so important for all, but particularly families with children when health and wellbeing is considered a priority. Developers show glamorous CGI pictures of their plans for amenity space and landscaping but this is rarely delivered, particularly where small trees are planted and are poorly maintained. The London Plan guidelines should never be compromised but positive encouragement should be given to developers to exceed these minimum standards.	Agreed.	Yes
Mary O'Connor	Policy CDH07	Part a) <u>must</u> provide (not should) and no allowance for off-site provision (iii).	National policy sets the limits for planning terminology as part of a flexible and responsive planning system	No
Marsfield (Avison Young)	Policy CDH07	SOPH is restricted to older persons, and so will not accommodate children therefore there is no need (in planning terms) to provide children's playspace. Policy CDH07 should be amended to remove this requirement for SOPH proposals.	Requirements can be applied flexibly if there is no need in planning terms.	No
Environment Agency	Policy CDH07	Although we support the policy criteria for provision of new and existing wildlife habitat including tree and shrub planting to enhance biodiversity, we recommend this is reviewed in light of the imminent introduction of Biodiversity Net Gain. Biodiversity Net Gain will be mandated through the Environment Bill when it is enacted, likely to be 2022. This will require developers to achieve at least a 10% biodiversity net gain as a result of development proposals, either within a site or off-site.	Agreed. Policy and text revised	Yes
Barratt London (QUOD)	Policy CDH07	Support the approach to amenity space standards as set out in Local Plan Table 11, as this is in conformity with the London Plan.	Support welcomed.	No
St William Homes LLP	Policy CDH07	The Council's intended approach to amenity and landscaping (Policy CDH07) is fully supported as it follows the principles of St William's landscape led approach and vision for all sites to deliver a net gain in biodiversity.	Support welcomed.	No
Finchley Society	Policy CDH07	Add a paragraph d reading 'The Council will act to stop all front gardens from being destroyed by refusing dropped kerbs for all domestic use and making an Article 4 Direction.'	The Council has no plans to introduce a boroughwide Article 4 Direction.	No
Barnet Society	Policy CDH07 & Paras 6.20.1-6	Would like to see an explicit commitment to the value (visual and environmental) of retaining front gardens in suburban residential streets.	Agreed	Yes
Finchley Society	Policy CDH07(a iii)	Add 'mere contributions to the maintenance of existing parks will not satisfy this policy.'	Contributions to improvements to existing and nearby open spaces are still merited as off-site provision	No
Finchley Society	Policy CDH07(b ii)	Begin this 'Hardstandings are not a generally satisfactory alternative to front gardens; where they are inevitable they should contribute positively .	Text revised to make explicit reference to value of retaining front gardens.	Yes
Historic England	Policy CDH08	We also recommend that this policy makes specific reference to heritage at Risk. There are several assets in Barnet that are on the national Heritage at Risk Register	Agreed	Yes
Historic England	Policy CDH08	"Archaeological Interest" First line should be changed as follows: "Scheduled monuments and <del>other</del> undesignated assets which are demonstrably of national archaeological importance..."	Agree	Yes

HADAS	Policy CDH08	Add new sentence to end of first paragraph: <i>The Council will produce a Heritage Strategy to promote the range of heritage, historic, cultural and archaeological assets across the borough attracting tourists and visitors to such attractions.</i>	Although the Local Plan cannot state a commitment to producing such a document the Council will consider the merits of developing a Heritage Strategy.	No
HADAS	Policy CDH08	<b>Archaeological Interest.</b> This should be reworded to align better with 6.21.5, and should include a reference to GLAAS	Agreed	Yes
Historic England	Policy CDH08	Also, there may be sensitivity to development/tall buildings within their settings, e.g. the Golders Green Crematorium list entry <i>mentions “extensive views to the south”</i> and <i>East Finchley Cemetery list entry mentions “good views from the higher ground in the northern part of the cemetery over the southern part and beyond to the churches in Hampstead Garden Suburb”</i> . It would be helpful if this policy included more detail in this respect.	Policy CDH04 on Tall Buildings makes reference to Historic England guidance on tall buildings	Yes
Former MHNF	Policy CDH08	We should be developing properties that will be Barnet’s ‘heritage assets’ in the future. Little of what we see being built recently and in planning, respects its context and distinctive local character. Policy CDH08 is really important in ensuring that harm to currently designated heritage assets is not allowed and that new developments create places of high-quality design and contribute to the positive character of the area. Where buildings are demolished the reuse of building materials should be fully supported.	History will reflect on the value of contemporary design. The SPD on Sustainable Design and Construction encourages re-use of building materials	No
Historic England	Policy CDH08	This policy makes no reference to Registered Parks and Gardens, we recommend that the policy is expanded upon to provide guidance on how these important, designated assets and their settings will be conserved. Barnet benefits from four RPAGs: <ul style="list-style-type: none"> <li>• Golders Green Crematorium (grade I; NHLE: 1001575 – private ownership);</li> <li>• East Finchley Cemetery (grade II*; NHLE: 1000835 – mostly owned by Westminster CC but with crematorium in private ownership);</li> <li>• St Pancras and Islington Cemetery (grade II*; NHLE: 1001688 – in public ownership by LB Camden and LB Islington); and</li> <li>• Avenue House Grounds (grade II; NHLE: 1001430 – in public ownership by LB Barnet).</li> </ul> Given that three of these RPAGs are cemeteries/memorial landscapes, there may be common issues such as the condition of memorials, condition and use of buildings, divided ownership/differential management, vegetation management, etc.	Agreed	Yes
Historic England	Policy CDH08	It is not necessary to replicate the provisions of the NPPF in a local plan policy and the wording at present does not quite reflect the NPPF accurately (see comments on paragraph 6.21.2 below). We recommend that these elements are removed and replaced with more detailed, locally specific criteria. Parts b) i-v are helpful and should be retained.	Agreed. Policy and supporting text revised	Yes
HADAS	Policy CDH08 (b)	iv Reword for clarity: <i>‘Be accompanied by a Heritage Impact Assessment with clear and convincing justification for any harm to a designated heritage asset’</i>	Policy revised and sets out how impact on designated heritage assets will be considered	No
HADAS	Policy CDH08 (b)	<b>Policy CHD08 (b) v</b> This provision is strongly supported.	The Council welcomes this support.	No
Chris Thomas (British Sign and Graphics Association)	Policy CDH09	We are content that draft Policy CDH09 and most of the supporting text conforms to Government policy and practice advice	Support noted.	No
Wade Miller-Knight	Policy CDH09	CDH09 was commended.	The Council welcomes this support.	No
Finchley Society	Table 11	Third line. There should be an indication of what ‘normally’ means. It will otherwise be hard to justify a refusal.	Agreed. Table revised.	Yes

Historic England	Table 12	Barnet's archaeological priority areas (APAs) are out of date which means that they are not compliant with the London Plan. Unfortunately the APAs are not due to be reviewed until 2023/2024. We therefore recommend that Barnet discuss options the Greater London Archaeological Advisory Service (GLAAS) to update the APAs.	Subject to planning reforms as proposed in the Planning White Paper the Council expects to conduct an immediate review of this Local Plan. This will enable consideration of new evidence on APAs produced in 2023/24	No
Finchley Society	Chapter 7	There should be recognition of the significance of the provision of appropriate car-parking facilities for the success of a town centre. Car-parking is dealt with in Chapters 4 and 11, but does not get any mention in Chapter 7. There must at the very least be adequate cross-references.	Agreed. Cross reference to Policy TRC03 added at para 7.7.6	Yes
Finchley Society	Chapter 7	This chapter should mention the importance of basic street cleaning and the removal of litter if Barnet's town centres are to become places which people want to visit and linger in, thus bringing business to shops.	Agreed. Text revised. Town centres should be clean and attractive if they are going to generate footfall.	Yes
Federation of Residents Associations in Barnet (FORAB)	Chapter 7	Town Centres - The current Local Plan anticipated a significant increase in comparison retail space A1 at Brent Cross and a modest increase elsewhere, much of it expected by 2021. Although none of this space has materialised the draft Plan surprisingly largely repeats this expectation. Given the difficulties experienced by retailers over the years since the current plan was adopted in 2012, we suggest it is unrealistic to expect to defend all the existing A1 space, as the Plan aims to do, let alone maintain the expectation of expansion. We would instead wish to see encouragement to convert space in secondary retail areas to residential or other uses.	As highlighted above the A1 use class no longer exists so there is no remit for the Local Plan to safeguard former A1 retail space.	Yes
Brent Cross South Partnership (DP9)	Chapter 7	The proposed and emerging Metropolitan Town Centre at Brent Cross sits both north and south of A406 as identified in the 2014 outline planning permission for Brent Cross Cricklewood and the Development Framework: this should be reflected in the Draft Local Plan.	Agreed. This is reflected in GSS02	Yes
LB Enfield	Chapter 7	The redevelopment of the town centres is another significant cross-boundary matter that will need to be collectively reviewed through our respective emerging Local Plans. The major regeneration of Brent Cross looks to become a new Metropolitan Town Centre providing a range of uses, including new homes, commercial space, an expanded retail offer, destination leisure and entertainment, cultural and arts facilities, restaurants, hotels as well as open space. We would like to have a greater understanding of the future strategy for Brent Cross. It is assumed that an updated retail study will be commissioned which looks at the wider catchment area from which Brent Cross draws its trade as a major regional shopping centre as well as the changing trends affecting the retail sector as the current retail evidence base dates back to 2017 and has been superseded by a series of economic trends and updated Government guidance. On this basis, we would like the opportunity to review and discuss respective emerging supporting technical evidence, assumptions on retail and leisure floorspace and related impact on in terms of the levels of vitality and viability. Enfield supports the policy in relation to affordable workspace, where this is secured in the most appropriate locations. Draft Policy ECY01 indicates that this will be directed to town centres across Barnet. Enfield would welcome the opportunity to further discuss the emerging evidence, opportunities to secure affordable workspace and share from your experience product, especially within nearby town centres. This would assist in ensuring that the right product is secured in the right location, without prejudicing other likely locations.	Revisions have been made to the section on Brent Cross. This will be reflected in our Statement of Common Ground	No
Former MHNF	Chapter 7	Lack of parking is always used as the key reason for not visiting a Town Centre and undoubtedly there is some truth in this, particularly when you acknowledge (2.6.4) that 70% of residents live in a household with a motor vehicle. The transition for many, from car journeys is a very long way off, particularly when there are too few viable and effective alternatives.	The Local Plan in its response to COVID19 reflects the interaction between town centres and surrounding residential areas. Reducing car journeys remains a priority for the Local Plan	No
Former MHNF	Chapter 7	Barnet's Town Centres are certainly not 'thriving' today. We see 'thriving' as a real aspiration to be achieved at an early stage in the lifetime of this plan. Because of complex land ownership issues, schemes that involve compulsory purchase may well be required, in order to transition centres from what they are today, where some of the retail stock is not fit for purpose for use by today's retailers/restaurateurs. The Council needs to be pro-active in facilitating change to arrest further decline	The Plan recognises the changing nature of retail and encourages an appropriate mix of uses.	No

		and to build the wide range of shops and services that will attract more people to shop locally. Barnet is a collection of villages and as such these centres have been what has attracted people to the area. However, many are tired and lack the offerings to grow the footfall vital to their long-term existence. For many, a vibrant night-time economy would be a huge advantage, 'sweating the assets' in real estate and encouraging community cohesion. A hotel, 2 screen cinema, and town centre gastro pub/wine bar would make a positive change in Mill Hill Broadway, attracting locals and those living nearby to spend their disposable income locally, rather than travelling to other areas.		
Former MHNF	Chapter 7	We see necessary regeneration of the Town Centre in Mill Hill to include new buildings of a size more suited to modern retailing. There could perhaps be a reduction in the total number of outlets because of decreased footprint. Several sites could then be used for mixed development, such as offices, community use, leisure etc.	This could be a consequence of the changes to the Use Classes Order with the introduction of Use Class E for commercial uses. This provide greater flexibility for landowners to respond within town centres.	No
Former MHNF	Chapter 7	Most people in Barnet do not associate themselves with Barnet per se (which of course is not to be confused with of our Town Centre) They live in and identify with Totteridge, Mill Hill, Edgware West Hendon etc. They rarely travel from Mill Hill to shop in Chipping Barnet for example. If Mill Hill doesn't have it, then Brent Cross probably will, unless they're looking for DIY goods in which case a trip to Borehamwood will be necessary! People's future spending patterns must be fully assessed before any commitment is made to develop more retail space, even though we might think it would be desirable to have a big new shiny Regional Centre, we certainly do not need a white elephant.	We acknowledge the impact of online shopping and COVID19 on the traditional retail format. The September 2020 changes to the Use Classes Order with the introduction of Use Class E for commercial uses as a replacement for A1 retail reduces the remit of the Plan to set targets for new retail provision.  The Council still has plans for Brent Cross to be a regional destination	Yes
Finchley Society	Chapter 7	This chapter should include a paragraph about the need for pavements to be uncluttered so that people, especially but not only the less mobile, can easily pass and repass. Shops which put goods for sale outside; advertisement hoardings; and erections masquerading as telephone kiosks; all need control. There is a risk that in the future charging points for electric vehicles may add themselves to this list.	Agree. Text revised	Yes
Former MHNF	Chapter 7	We suggest that we should be looking to reduce the number of charity shops (now six in the Broadway), and also to reduce Payday loan and betting establishments, through careful licencing. Additionally, shops that sell goods from stalls at the front of their shops should be restricted and should offer only goods that are attractive within the street scene. e.g fruit and veg. or flowers, but not toilet rolls.	With the changes to the Use Classes Order the Local Plan can no longer pursue this requirement	No
Finchley Society	Section 7.7 to 7.9	Nowhere is there mention of coffee shops (with brands like Costa, Starbucks and Café Nero as well as many independents). These have become a vital part of town centres, and an important local amenity. Most of them are not open in the evenings. Finchley has a large number; they serve as locations for socialising and remote working as well as for consuming food and drink. Their policy of providing a 'third space' (neither private home nor public) helps many people to deal with overcrowded and cramped living space. They should be included in the analysis of town centres, and their number and quality should be monitored. They should not be adversely affected by rules on hot food takeaways, even though they may provide some light hot food as a sideline to coffee.	The profusion of coffee shops in town centres reflects their popularity. Such provision is best left to market forces.	No
Finchley Society	Section 7.3	There should be a para or paras in this section about the need to appeal to local people and visitors to come and linger, rather than just using the town centre for quick grocery shopping, by promoting late opening hours of non-food retail stores (which currently shut at 5.30/6.00 p.m.); promoting local history and heritage with e.g. informative signs and guided walks; attractive murals on end walls; better signage to local attractions; greening - trees/flower beds; actively but sympathetically discouraging begging and rough sleeping; dealing with routine town centre problems rapidly to improve the feeling of security, perhaps through a town centre manager; and better management of road works	Agreed, this is reflected in the Local Plan helping to make more efficient use of Barnet's town centres and encourage longer visits.	Yes
Former MHNF	Section 7.5	We challenge the need for extra retail space at Brent Cross based on current retail market trends. In the USA many shopping malls are contracting with say, one of several wings being converted to offices or residential. The passion for retail therapy has significantly reduced and the internet will continue to	The Reg 19 recognises the critical importance of BXC to the Borough and the wider sub-region. Given the continued economic uncertainty a sufficiently flexible	No

		deplete the market share of bricks and mortar retailers. There needs to be a detailed analysis of buying patterns based on recent volumes of 'shopping trips and transaction values' in order to predict the future accurately. Further, with the pressure to reduce carbon footprint and journeys by car, there needs to be a better understanding of what Barnet residents will expect in the following areas in future: 1) Buy on-line for delivery at home or another drop-off point 2) Buy locally (within 1-2 miles) where required items are readily available/can be carried home 3) Travel up to 5 miles (perhaps to Borehamwood) for specific items not available locally. 4) For items where more choice is needed – travel up 5 miles (could be Brent Cross or Wembley for example) 5) Or for even wider choice/greater experience, travel into Central London to Oxford Street or Westfield. 6) Visiting another centre as an alternative shopping experience, maybe just window shopping.	planning policy context is required to ensure that a successful and sustainable scheme can be delivered.	
Brent Cross South Partnership	Section 7.5 and TOW01	This section and policy should be clear that the outline planning permission for BXC is for comprehensive regeneration of the area to create a new mixed-use town centre both north and south of the A406 (High Street North and High Street South). The new Metropolitan town centre should be identified on the proposals map.	Agreed. This is reflected in the supporting text. Brent Cross is shown on the Policies Map as a Growth Area.	Yes
Former MHNF	Para 7.3.1	We acknowledge support from the Council to get the bins off the street in our Town Centre and to replace the process of waste disposal with regular time banded bag collections. This has for the most part worked well and is much appreciated by users of the high street.	Support welcomed.	No
Elizabeth Silver	Para 7.3.5	Healthcare facilities should not rely on CIL and S106 contributions; Developers can claim exemption on grounds of viability. Healthcare provision needs to be put in first, like water and sewage supplies, not when the last resident has moved into the development.	The funding of the NHS is beyond the remit of the planning system. Through working with North Central London CCG both CIL and S106 can be utilised to support the timely delivery of new health facilities.	No
Finchley Society	Para 7.4.1	Fourth bullet point. Payday Loan shops may be yesterday's problem; have they not almost vanished? Betting shops may be on the decline, too. Fifth bullet point. Dry-cleaning establishments, and perhaps also laundrettes, which have an important function, should be mentioned. It is surprising that no mention is made of charity shops. These have filled the rising vacancies created by the decline in commercial retail premises. Such shops serve useful functions, but are also a burden on the Council in terms of rates, and there should be a clear policy as to their number and standard. Too many charity shops, like empty premises, can give the impression of a struggling Town Centre, without quality retailing, and hence actually deter people from visiting and lingering.	Such uses remain a problem as long as they are attracted to town centre locations. The Plan can provide no added protection for laundrettes and dry cleaners. Charity shops are now playing an increasingly important role in the town centre offer. Attitudes are changing towards them.	No
Finchley Society	Para 7.4.2	Second bullet point. The TCFNA is already three years old, and dated in various respects. These figures must be revisited. It is hard to believe that additional comparison floorspace will be needed in Barnet given the decline in the retail sector.	Following the radical overhaul of the Use Classes Order the Council will not be refreshing the TCFNA.	Yes
Brent Cross South Partnership (DP9)	Para 7.4.2	Clarity is needed as to whether the 77,000m2 referenced includes the retail floorspace consented within the BXC planning permission.	This is additional capacity. Further clarification of this added	Yes
Former MHNF	Para 7.4.3	With regards to 7.4.3 We believe that small cinemas (2 screens) are needed in Town Centres to increase leisure facilities and boost footfall for the benefit of all and to restrict local journeys. We recall that Mill Hill used to have two cinemas in the High Street. The majority of our residents will return home after work and often go out to the cinema, probably with family/friends and so a car is most likely to be used for such journeys, unless it is local. It is not desirable to have a multi-screen cinema at only one location within the borough and certainly not one that relies heavily on travel by car. We suggest that the proposed expansion of Brent Cross has not been well thought through as it comes without the basic transport infrastructure to make it attractive to travel there by public transport.	Brent Cross is a sub-regional destination attracting people for leisure and retail activities. The Plan as part of COVID19 recovery wants town centres to be thriving and when confidence returns the Council hopes that there will be commercial investment in leisure within town centres.	No
Finchley Society	Para 7.4.3	Fifth bullet point. This should be revisited in the light of the woes of the Phoenix in East Finchley. The Arts Depot however deserves mention, as do other live theatre and music venues.	While there is uncertainty in all these sectors following COVID19 there are no merits in making reference to specific cultural facilities.	No

TfL	Para 7.7.6	We strongly support that development in town centres will be expected to enhance the public realm, and that reducing car travel will be encouraged. To facilitate this, we urge the Council to consider opportunities to reduce on-street and off-street car parking as part of town centre development. Reductions in the dominance of vehicles has been shown to support town centre vitality by making the public realm more pleasant and inclusive.	Improvements to the public realm are essential in getting people back in Barnet's town centres. The Council supports the Healthy Streets approach to reduce car dominance and improve street safety.	No
Former MHNF	Paras 7.7.2 & 7.7.4	We also agree 7.7.2 that digital technologies can help drive footfall. We note your offer of support here but it is not clear how this will manifest itself. We would be interested to see how you envisage this being brought into play and by whom? We note that you acknowledge 'Markets are a key generator of Footfall'.	The Council as an organisation will respond to innovative ideas that contribute to thriving town centres.	No
Spires Barnet (Williams and Gallagher)	Policy TOW01	Support overarching objective. Suggest amendment to text ...viability of these centres by the approval of edge-of-centre <u>and out of centre</u> development. In addition, any proposal of more than 500 sqm <u>for</u> retail, office or leisure development <u>in an edge or out of centre location</u> must be supported by an impact assessment.	Agreed	Yes
Barnet Cycling Campaign	Policy TOW01	Policy fails to recognise that town centres are unattractive because they are dominated by polluting, noisy and dangerous traffic. In towns where traffic has been restricted footfall and trade has increased.	Agreed – policy revised	Yes
Brent Cross Dev Partners	Policy TOW01	TOW01 states that Brent Cross through GSS02 is to provide a strong retail offer as well as a wider mix of uses including leisure, office and other commercial, community and cultural uses to create a regional destination centre for North London. The reference to “regional destination” should be replaced with “Metropolitan Town Centre” for clarity and residential uses should be included within the draft policy text.	Agreed	Yes
Finchley Society	Policy TOW01	TOW01c Add 'The Council will set up and seriously support town teams, town centre managers and the like.' TOW01d. This should be given some content. What sort of shops will be encouraged? Often shops which seek a cheap base, without any particularly local function, locate in parades; a single multi-purpose shop may meet most if not all really local needs, and because of that be viable. TOW01f. The last but one sentence focusses on edge of centre developments; but ones completely out of the centre may be more deleterious.	Our wording is more appropriate  Following changes to the Use Classes Order TOW01 has been revised.	Yes
New Barnet Community Association	Policy TOW01	110,000 sqm new retail space seems unrealistic and may have negative impact on TCs.	The September 2020 changes to the Use Classes Order with the introduction of Use Class E for commercial uses as a replacement for A1 retail reduces the remit of the Plan to set targets for new retail provision.	Yes
Landsec (Indigo)	Policy TOW01	This policy would require the re-provision of restaurant and leisure floorspace at the GNLP to go through the sequential and impact tests. The policy and supporting text should be amended to reflect that established locations should not be required to do this if there is no net gain in restaurant and leisure floorspace.	This is consistent with the NPPF. Application of the sequential test should be applied to ascertain whether a town centre site could be used. The September 2020 changes to the Use Classes Order with the introduction of Use Class E for commercial uses as a replacement for A1 retail reduces the remit of the Plan to set targets for new retail provision.	yes
Redrow Homes	Policy TOW01	Support	Welcome the support	No
Mayor of London	Policy TOW01	The Mayor welcomes Barnet's proactive approach to the management of its town centres through various frameworks, strategies and SPDs and the overall planning policy approach set out in the draft Local Plan. It is noted that the District Centre of Finchley Central is called Church End in Annex 1 of the Intend to Publish London Plan. It is unclear how the borough will control the type of Class A1 floorspace delivered in line with proposed Local Plan Policy TOW01.	With the changes to the Use Classes Order the Local Plan can no longer pursue this requirement.  Plan revised to clarify Church End Town Centre now known as Finchley Central	No



Mayor of London	Policy TOW02	Smaller scale mixed use resident development should also be promoted in Barnet's Local Centres, in line with draft Local Plan Policy TOW02(e) which strongly encourage residential use on upper floors in town centres. The Mayor welcomes the reference to the Agent of Change principle in order to protect residential amenity from new development, however, the principle should also be applied in the main policy to protect existing businesses from residential development introduced nearby, and not just in the supporting text at proposed paragraph 7.9.3.	Policy revised with greater emphasis on Agent of Change	Yes
Former MHNF	Policy TOW02	We think the reduction to 65% A1 space is welcome. We are not sure whether it will be enough notably as we drive up the night-time economy. Flexibility is undoubtedly necessary. Equally, some planning guidance will be necessary to stop a High Street being made up solely of nail bars, hairdressers and charity shops. In Mill Hill four major banks (shortly a fifth) have left our High Street, and this has undoubtedly reduced footfall in the street. Without many office workers seeking lunch and buying products to take home, the High Streets are suffering.	The Plan will be revised to reflect the changes to the Use Classes Order and the introduction of Use Class E Commercial Business and Service uses. The A1 use class no longer exists and there is greater flexibility for a former A1 use to convert to another use within the new E use class and contribute to town centre vitality and viability.	Yes
Redrow Homes	Policy TOW02	Part g) should reflect para 109 of NPPF and require that proposals are refused if they result in a 'severe' impact on highway safety and/or the road network.	The policy is considered to comply with the NPPF.	No
Spires Barnet (Williams and Gallagher)	Policy TOW02	Object to part a) and c) as in conflict with providing a mix of uses in TCs. Vacancy for 12 months will create vacancy for a long period and then permission for change of use will take more time. Need more flexible approach that should include key test for impact on vitality and viability.	TOWO2 has been rewritten following the replacement of A1 by the new commercial E use class. The A1 use class no longer exists and there is greater flexibility for a former A1 use to convert to another use within the new E use class and contribute to town centre vitality and viability.	Yes
Client interested in North Finchley TC (Quod)	Policy TOW02	In our view the A1 retail retention figure within Policy TOW02 is too restrictive and not appropriate given the ongoing changes within the retail sector. The UK retail market has been experiencing significant structural changes with the closure and consolidation of major national stores and brands. Published evidence, including from the GLA, shows that it is the middle tier centres (Major and District Town Centres) that are most at risk. Those centres at the top of the hierarchy are forecast to continue to be the main locations for comparison goods shopping, with smaller centres fulfilling a convenience and top up function – Major and District Centres fill the middle ground that are likely to be most exposed to the structural changes as the retail sector consolidates. As a result and given the continued economic uncertainty, a more flexible policy framework is required to ensure that successful and sustainable town centres can be maintained. Policy TOW02 as currently drafted has the potential to undermine the vitality and viability of town centres, limiting the delivery of other main town centre uses such as residential, office and leisure. This is not in accordance with the New London Plan which seeks to promote town centres as “ <i>strong, resilient, accessible, and inclusive and viable hubs for with a diverse range of uses</i> ” (Draft Policy SD6). As such, we would request that the percentage retention figure is removed from the policy wording.	TOWO2 has been rewritten following the replacement of A1 by the new commercial E use class	Yes
Sport England	Policy TOW02	Support this policy allowing community facilities, which would allow sport and recreation facilities.	We welcome the support.	No
Former MHNF	Policy TOW03	We do believe that “Clusters of similar retailers” should be avoided, but how big is a ‘cluster’? In Mill Hill, planning was granted to turn an A2 ex bank into a pizza takeaway while three others existed within 75 metres. Further, the new incumbent has three other sites each within 2/3 miles of Mill Hill, and since most of his products are delivered by motor bike or collected by car, it is adding greatly to the carbon footprint. The market demand for pizza locally has not increased by a third to ensure the financial viability of the original three providers. Planning guidelines should include a true assessment of competitive value, not simply leave it to market forces. Planning seems to evaluate every other	Changes to the Use Classes Order in particular to A1 to A5 uses introduce greater flexibility between uses with the intention of helping business and letting market forces prevail. There is no locus for the planning system to get involved in details such as competitive value.	Yes

		parameter, and it should consider the impact on existing businesses and overall benefit to the vibrancy of the Town Centre.		
Spirees Barnet	Policy TOW03	Should be emphasised that not all A5 uses will be detrimental to TC health (including healthy eating hot food takeaways). We would like to see reference to the Council's Healthier Catering Commitment.	TOW03 revised to reflect changes to the Planning Use Classes Order and the replacement of A5 uses. vii) refers to the Council's Healthier Catering Commitment and overall the Policy will not stop Hot Food Takeaway use, if deemed appropriate under the criteria based policy.	No
Mayor of London	Policy TOW03	The Mayor welcomes Barnet's approach to managing the clustering of certain uses in its town centres, especially hot food take-away Class A5 uses within 400m of the boundary of an existing school or youth centre, in line with Intend to Publish London Plan E9.	We welcome the support.	No
Mayor of London	Policy TOW04	The Mayor welcomes Barnet's positive approach to the night time economy and the broad definition that it includes all economic activity taking place between the hours of 6pm and 6am.	We welcome the support	No
Brent Cross South Partnership	Table 13	The outline planning permission for BXC states that the new town centre will be both north and south of the A406, and this should be noted in Table 13. We therefore suggest that the reference to "Brent Cross Shopping Centre" is changed to "Brent Cross" to reflect the position as established by the outline planning permission.	Agree	Yes
Finchley Society	Table 13	Table 13 should also list the out of town retail parks mentioned in 7.2.1.	Such places do not form part of the town centre hierarchy	No
Friern Barnet and Whetstone Residents' Association	Chapter 8	Whilst it is appreciated that provision of healthcare facilities and staff capacity, and of some other types of community infrastructure, is not a direct function of the Council as planning authority, nevertheless the Council is a "gatekeeper" for the approval of development proposals which either individually or cumulatively will impact significantly on the level of local demand for primary healthcare or other services and facilities. In order to protect the availability of such services and facilities (which are already under stress) for existing local residents as well as to ensure they are available for residents of new residential accommodation, a mechanism is required to ensure that large new residential developments are not brought into use unless and until an objective assessment demonstrates that the necessary services are available at an appropriate level in appropriate locations. We suggest appropriate additions in the Policies set out in Chapters 5 and 8.	Growth needs to be supported by infrastructure. The Infrastructure Delivery Plan (IDP) provides an assessment of current infrastructure provision, future needs, gaps and deficits, along with an indication of costs of providing infrastructure.	No
Middlesex University (Tibbalds Planning)	Chapter 8	<u>Provision for Children and Young People</u> The University is disappointed to find that there is no explicit reference to, or policy support for, higher and further education.	Section added on Further and Higher Education	Yes
Canal & River Trust	Chapter 8	Note that the Phoenix Canoe Club, or the potential for any other community watersports opportunities within LB Barnet, are not mentioned within the Local Plan. We support this local facility and the potential for enhanced use of the reservoir for community uses.	It is not feasible to make specific reference in the Local Plan to all community clubs and facilities that operate in Barnet.	No
Department of Education	Chapter 8	Particularly interested in responding to any update to the Infrastructure Delivery Plan/ Infrastructure Funding Statement, viability assessment or other evidence relevant to education which may be used to inform revisions to local planning policies or the CIL charging schedule. Request to be engaged with DfE and consult on any relevant future consultations. Council should set out education infrastructure requirements for the plan period. Where additional need for school places will be generated by housing growth, the statement should identify the anticipated CIL and Section 106 funding towards this infrastructure. The statement should be reviewed annually to report on the amount of funding received via developer contributions and how it has been used.	The IDP/ IFS has been published and the new CIL Charging Schedule has been subject to public consultation.	No
CCI London Community Church	Chapter 8	8.3.1 – Community Infrastructure – reduction in funding, increased levels and demand and rising expectation – what if the location is self-funded? If the facility is pre-existing and self funded?	The Local Plan can only address issues that come forward through the planning system. Ensuring that new community infrastructure is appropriately located	No

		<p>8.3.2 – What is the consideration for an already existing infrastructure and is accessible to the local community.</p> <p>Policy CHW01 – Community Infrastructure- who is considered a ‘partner’ with whom the council plan to work with regards to places of worship, especially already established places of worship? Apart from the opening paragraph, no provisions or steps are made clear as to how this will be implemented.</p>	<p>in accessible locations and supported in the long term is covered by Policy CHW01. This policy also sets out how the Council will consider any loss or replacement of an existing community facility.</p> <p>The Barnet Partnership Board is an advisory Committee which brings together key public, private and voluntary organisations such as North Central London CCG and Community Barnet to identify and articulate the needs and aspirations of local communities.</p>	
Elizabeth Silver	Chapter 8	<p>Para 8.2.3 With an increasing proportion of young and old population, healthcare provision will need to increase, not decrease as stated in 8.3.1. Para 8.2.4 Libraries are a great social leveller. The 14 libraries should be re-instated instead of their buildings being sold off (see notes to 8.3.5). Lack of library facilities hinders social mobility as lower income groups increasingly do not have space to store books, nor money to buy them, thus impacting on the next generation’s future earnings. Para 8.3.1. Decrease in funding for healthcare and community facilities is incompatible with an increase of 60,000 (15.3%) in population. This is unsustainable development, leading to a considerably lower standard of living. “efficient, flexible and adaptable” as applied to community facilities, may be unworkable for Health and Safety (hygiene) reasons. For example can a GP’s surgery double up as a library, or a library as a nursery? Para 8.3.2 If there is no parking at doctors’ surgeries, then it will be difficult for patients with mobility problems to be brought there in a friend’s car or even by taxi, and for doctors to work out of hours. Para 8.3.3 Only if there is any expansion space left. For example at Edgware Hospital, if all spare parking place is filled by housing, there is no room to expand. Para 8.3.5 Reconfiguration of the library estate has effectively meant a loss of space for books. This discriminates against people living in smaller properties with less storage space for books. Libraries with a good stock of books aid social mobility. A whole generation grows up only reading short extracts on the internet, with associated difficulties in comprehension skills. Para 8.9.1 and 8.9.2 Sale of Assets of Community Value (ACVs) is very worrying. Para 8.10 and 8.11 Statements conflicting with sale of ACVs such as sites 1,3,4,5 (part of),17,18,23,26,40, 41,45 and 48.Policy CHW01 – Community Infrastructure - If GP surgeries and library facilities are only located in town centres, this can make them less accessible to those with mobility problems. i. and j. Fewer care home spaces would need a much higher provision of in-home carers.</p>	<p>These are issues that have an impact on peoples lives and it is the role of the planning process to take these into account and apply Local Plan policies when more detailed proposals come forward.</p> <p>The Reg 19 Local Plan is supported by the Infrastructure Delivery Plan (IDP) which provides an assessment of current infrastructure provision, future needs, gaps and deficits, along with an indication of costs of providing infrastructure.</p>	No
Former MHNF	Chapter 8	<p>We also consider that GP practices locally are inadequate as they are overloaded with patients with an ever increasing and challenging set of health issues. Primary care locally is not meeting the demands coming from recent growth and is not apparently prepared for the further growth being planned. Getting a GP appointment is a very real challenge with wait times, currently at all practices, of 2-3 weeks other than for emergency cases. We do not see the necessary, tight integration of the NHS in Planning for future developments. It is interesting that Policy CHW01 does not include mention of Primary or Secondary Health Care which is a significant omission as the Council is responsible for improving the health of their local population and for public health services, albeit the NHS is the delivery vehicle, along with private providers.</p>	<p>We continue to work closely with North Central London CCG in the development of the Local Plan and the supporting Infrastructure Delivery Plan.</p>	No
Mayor of London	Chapter 8	<p>The Mayor welcomes the overall approach to delivering community infrastructure and health and well-being in Barnet. This is reflected in Barnet’s site allocations that seek the re-provision of community infrastructure where a site is to be developed.</p>	<p>We welcome the support</p>	No
Finchley Society	Section 8.13	<p>This section should be more realistic, and recognise that there is a lot of crime and disorder in Barnet, perceived by many as increasing, and that there is only a limited amount that Barnet Council can do about it, since policing is not within their control.</p>	<p>The Local Plan has an important contribution to make in terms of making the Borough a safer place, designing out crime and promoting safer streets.</p>	No

Finchley Society	Section 8.10	The Plan does not address Barnet's pavements. Maintaining the quality of pavements (repair, width, etc.) is important for: (a) safety of individuals as they walk, and (b) encouraging walk rather than driving, thus fostering better health. In many areas pavements are in poor repair (due to lack of maintenance, tree roots, etc.) or are too narrow. The Plan should clarify the Council's intentions and capital allocation for this vital element of local infrastructure. [This also pertains to Healthy Streets and Active Travel in Chapter 11].	Agreed that for pedestrians surfaces should be safe. See previous response to Finchley Society at Chapter 6 on Character, Design and Heritage	Yes
Barnet CCG	Section 8.10	Welcomes this section on promoting health and wellbeing recognising the role of planning to create healthy environments and influence many of the determinants of health.	Support welcomed.	No
Barnet CCG	Section 8.11	Reword title of section to read: Access to integrated health and care services	Agreed.	Yes
Barnet CCG	Section 8.11	Add para under 8.11.2 to read: "A key focus of the North Central London integrated health and care plan is to prevent ill health, which includes partnership working to tackle the wider determinants of health. An integrated care system will deliver services at different levels, including neighbourhood networks based around GP practices, 'Borough Partnerships' and as a North Central London 'Integrated Care System'."	Agreed.	Yes
Friends of Finchley Way Open Space	Section 8.12	Strongly support this element of the Plan.	This support is welcomed	No
Friends of Finchley Way Open Space	Section 8.14	I do not understand why public houses and their encouragement have been placed in the wellbeing chapter. This policy reflects a very old fashioned and somewhat sexist view of society. Pubs do not contribute to wellbeing. Alcohol is a major cause of both street violence and domestic violence. The area of North Finchley with several pubs is one of the crime hotspots of the borough. Public houses are no longer 'the heart of the community's social life'. This is especially true in an area with a sizable Jewish and Muslim population. The closure of pubs in recent years on a mass scale reflects changing social habits and the multicultural society Britain has become. Moreover, younger people drink less alcohol than older generations and the plan focuses on younger people. The protest at the closure of the Bohemia in North Finchley was 10 years or more ago when those now forming the younger generation were still children. Any visit to almost any pub that is not essentially a restaurant or does not have an event on will show that most pub goers are male. Barnet needs to consider the socio-demographic of those who respond to local plan consultations in revising this policy. A better strategy would be to enable coffee shops to stay open later.	The contribution of pubs to community well-being is recognised by public health as well as their designation as Assets of Community Value.. COVID19 has further highlighted their contribution as a destination away from home.	No
Chris Carabine	Section 8.3	There has already been very substantial residential development and population increase in Mill Hill ward and the infrastructure is not keeping up. There are no new supermarkets hence the existing one struggles to maintain stock, no new secondary schools, and roads are over-used and becoming very dilapidated and unsafe. Passengers at Mill Hill East TFL station are already experiencing difficulties boarding trains in rush hour periods and there will be many more residents to service on completion of the Millbrook Park etc developments at the Council Depot and Barracks sites.	Chapter 12 sets out how the Council intend to deliver infrastructure to support growth and development in Borough. It indicates that it will work with a range of public and private stakeholders. The Infrastructure Delivery Plan informs the Council's capital programme and its work in terms of supporting other agencies delivering infrastructure requirements, particularly through developer contributions.	No
Finchley Society	Section 8.4	There should be a recognition of the need for a closer correspondence between the educational curriculum and local employment opportunity, in order to achieve the aspirations of Chapter 9.	This is reflected in Chapter 2 on Challenges and Opportunities	Yes
Former MHNF	Section 8.4	There is a growing need for an additional secondary school in the Mill Hill area. With thousands of new flats and properties being erected in the area, there is a severe lack of secondary schools. There are a staggering 13 primary schools in the Mill Hill area. Some of these are faith schools and some of these are private/independent schools. There are only FOUR secondary schools: Mill Hill Country High School, Cophall Girls School, the Mill Hill Foundation (independent/private) and Hasmorean Girls' School, but the latter is a faith school and only two of the above are state schools. While Mill Hill County	The Local Plan reflects priorities identified in the Council's Education Strategy. That is the platform for setting out need.  The Infrastructure Delivery Plan (IDP) provides an assessment of current infrastructure provision, future	No

		<p>High is an outstanding school, it has a small catchment area, and children who live in Mill Hill East or Mill Hill Village have no chance of being offered a place. Cophall Girls school is a single sex school, alienating half the population of 11-18-year olds who need an education. Not all families can afford to pay for education, ruling out Mill Hill School. It is not stated in the Local Barnet Plan section 8 paragraph 8.2.4 that any new secondary schools will be funded. However, we feel there is a huge need for an additional secondary school in Mill Hill. The primary schools far outnumber the secondary schools leaving many families panicking about secondary school choices, and very disappointed when they cannot achieve their choice sufficiently close to home. There is an increase in demand for secondary schools as the population soars in the area. This need must be met with infrastructure to support the local community, especially its children, the future of this world. We have had discussions with the management of Compton School (Finchley) and they were keen to establish a 1200 pupil public secondary school on the IBSA Kingdom Hall site on the Ridgeway NW7. Such a school could insist that all pupils walk or cycle to school as it is close to Millbrook Park and other new developments along the Ridgeway. This would be hugely popular with local residents and their children, and would greatly reduce traffic congestion locally, and the anxiety for parents regarding their offspring using public transport. We would still like to see this brought forward and believe there are compelling reasons why it should happen. We are generally not in favour of faith schools as they do little to help social/cultural integration. Hasmonian boys and girls' secondary schools are in Mill Hill and Hendon, but since they admit orthodox Jews, for the most part, (and most of their students do not reside in NW7), they do not help to fill the secondary schooling needs for the rest of the population of NW7. Perhaps a greater emphasis on Science, Technology Engineering, and Maths (STEM) disciplines could be delivered in our schools working with the RAF Museum, Middlesex University, and a centre for children having a strong focus on educational active play which promotes STEM in a fun way. While the new Unitas centre at Montrose Park could help the 11-18 age group in this regard, a facility for younger children should be developed to encourage early interest in STEM. Perhaps an interactive Play Museum for children under 11, along the lines of that provided in Dubai by OliOli could be brought to Barnet. See link at <a href="https://olioli.ae">https://olioli.ae</a> Another example of a centre that focuses on learning through play and has excellent reviews is the Children's museum in Halifax. <a href="http://www.eureka.org.uk">www.eureka.org.uk</a></p>	<p>needs, gaps and deficits, along with an indication of costs of providing infrastructure. This will be a live document that will be continuously updated. Planning Obligations in the form of CIL and S106 will be used to help deliver new social infrastructure in the Borough.</p>	
Department of Education	Section 8.4.	<p>The Plan refers to the Education Strategy for Barnet 2017-2020 as part of the evidence base. Advise that this evidence base be updated and monitored accordingly to ensure an up to date picture of the need for school places across the Borough throughout the plan period, acknowledging that need can change. This would help to demonstrate that the approach to the planning and delivery of education infrastructure is justified.</p>	<p>Agreed – references to new Education Strategy and Schools and Settings Improvement Strategy added</p>	No
West Finchley Residents Association	Para 8.10	<p>Fails to recognise the management of pavements in support of encouraging people to walk to ensure they are of a good standard, clean and maintained.</p>	<p>Pavements are not managed by the Planning department; however, the Plan does endorse the Mayor's Healthy Streets approach which seeks to improve street safety, comfort, convenience and amenity.</p>	No
Finchley Society	Para 8.10.1	<p>This paragraph should acknowledge the importance of access to even small but very local open space.</p>	<p>Agreed. All local open spaces make a contribution to health and wellbeing no matter how small</p>	Yes
Friends of Finchley Way Open Space	Para 8.10.1	<p>I agree that the built as well as the natural environment is a crucial element in physical as well as mental health. Over-densification of development in high and very high tower blocks can work against this. Access to small but very local (within 400 metres) open space is important. These small spaces may be rated as of low value, low quality as a result of being too small to support facilities that Barnet counts in its valuation of green spaces. However, these small spaces in otherwise fairly urban areas are highly valued by local residents and serve as havens for wildlife and may be parts of wildlife corridors.</p>	<p>All local open spaces make a contribution to health and wellbeing no matter how small</p>	No

Friends of Finchley Way Open Space	Para 8.10.3	While I support the Healthy Streets initiative, care must be taken that this does not discriminate against those with limited mobility in an area of significant hills. Taxis are quite expensive if this is one's daily mode of transport.	There is no intention to do this through the Healthy Streets Initiative	No
Finchley Society	Para 8.10.3	The Healthy Streets initiative must not be implemented in a way that discriminates against those with limited mobility in an area of significant hills.	There is no intention to do this through the Healthy Streets Initiative	No
Finchley Society	Para 8.10.4	Public toilets are frequently vandalised, so their placement, safety and visibility is important.	Agreed. Reference made to good design and management of such facilities.	Yes
Friends of Finchley Way Open Space	Para 8.10.4	Public toilets are frequently vandalised, so their placement, safety and visibility will be important.	Agreed. Reference made to good design and management of such facilities.	Yes
Former MHNF	Para 8.10.4	We note that the Major of London established funding for water fountains in the Thames Water area and these are maintained over a 20-year lifecycle. How do we get a public (drinking) water fountain in our Town Square to reduce single use plastic bottles and to make available drinking water in our Town Centre in the interest of Health and Wellbeing? Reference 8.10.4	Through the Infrastructure Delivery Plan with support of Public Health	No
Finchley Society	Para 8.11.1	The draft Plan glosses over the implications that the projected population growth will have for primary care facilities (as well as for hospitals). These facilities will have to be accessible, not requiring long walks. The final Plan will have to deal fully and honestly with this subject.	The Council works closely with the NHS and the Local Plan has to reflect the priorities and programmes of the health sector in order to be found sound.	No
Finchley Society	Para 8.11.2	It is unclear what is proposed, and a short summary would be worthwhile. It is vital that GPs have access to, and use, up-to-date facilities.	Agreed. A cross-reference is added to the IDP and a short summary on future provision has been added to the text.	Yes
Friends of Finchley Way Open Space	Para 8.11.2	It is vital that GPs have access to, and use, up-to-date facilities. Cornwall House Surgery, for example, is not fit for purpose to deliver C21st healthcare in a C18th building with no lift and carpets 30+ years old.	The Council works closely with North Central London CCG to ensure that planned growth is supported by infrastructure. Government funding of the NHS is the main vehicle for ensuring provision of up-to-date facilities.	No
Finchley Society	Para 8.12.1	The Plan should indicate where these may be.	This is a matter for the Infrastructure Delivery Plan	No
Finchley Society	Para 8.13.2	We support Secured by Design and all efforts to design-out crime from public spaces and also from residential areas subject to personal attacks and burglaries.	The Council welcomes this support	No
Friends of Finchley Way Open Space	Para 8.14.4	I do not believe that pubs should not be included as assets of community value unless they are of historic importance.	Pubs will continue to be listed as ACVs as long as communities continue to nominate them.	No
Finchley Society	Para 8.14.5	Add as another indication how much the pub is used.	That is already covered by the question about positive contribution.	No
CAMRA	Para 8.14.6	Marketing evidence prefer 24 months; if this is not workable, then 'at least 18 months' would be acceptable.	Reference to 24 months marketing added to be consistent with London Plan.	Yes
Friends of Finchley Way Open Space	Para 8.14.6	I consider that the proposed conditions are far too restrictive on private sector businesses.	Such conditions are merited in order to protect these community assets	No
CAMRA	Para 8.14.6	Independent valuation - more details on the marketing exercise would be useful; for instance, it is important that pubs are offered free of tie and restricted covenant.	This level of detail is not appropriate for including in the local plan.	No
Finchley Society	Para 8.2.3	states that there will be an increase in the proportion of older and younger residents but seems to ignore those in the middle. Surely the current younger people will be middle aged by the end of the Plan timescale. Is anything planned for this age group? Transport is probably very important to them as they will be prime age working adults.	The older and younger sections of the population have more specific needs than those of the middle aged. It is right that the Plan should focus on these sections.	no

Clive and Gill Hailey	Para 8.2.4	Imperative that the Infrastructure Delivery Plan should be an integral part of the Local Plan and carefully linked to each & every development, so the essential improvements to infrastructure are available when housing is built, not afterwards. This should be related now with regard to the North London Business Park development, as for example it would seem that the secondary school expansion there is not matched by any additional primary school provision in the area, and there isn't any provision of additional library, community spaces or healthcare!	The IDP is an integral part of the supporting evidence base used to inform and justify the policies and proposals included within the plan	No
Finchley Society	Para 8.3.10	There should be a sentence or two about the (very significant) role of the voluntary sector and the help the Council will offer them.	Agreed. Revise text to acknowledge contribution of voluntary sector.	Yes
Finchley Society	Para 8.3.2	Second bullet point. There should be a wide range of facilities; some by their nature cannot be available to all but should not therefore be banned.	The Local Plan reflects that in principle such facilities should be accessible to all.	no
Finchley Society	Para 8.3.3	This is strongly supported.	The Council welcomes this support	no
Finchley Society	Para 8.3.8	In one of the largest London boroughs with inadequate swimming facilities, having to wait until 2036 for increased provision is unacceptable.	Agreed. Wording clarified.	Yes
Finchley Society	Para 8.4.1	Something much stronger and more precise is needed here or somewhere else in the Plan.	Text will be revised to reflect new Education Strategy	Yes
Finchley Society	Para 8.4.3 & 8.4.4	All this is too imprecise for a Plan. There must be an indication of where these facilities will be sited, as the population increases.	The detail on location of new facilities is provided by the Infrastructure Delivery Plan, to which a cross-reference has been made	Yes
Friends of Finchley Way Open Space	Para 8.4.4	Provision for young people must be inclusive and for all. The current text reads as if it is only for those from more deprived backgrounds who need 'multi-agency support'.	The text is inclusive. The multi-agency drop in centre is an example of a facility for young people.	No
Finchley Society	Para 8.5.1	Day centres need to be well publicised and outreach to those most isolated and lonely is vital.	Agreed although the Plan is not the best vehicle to publicise such services.	No
Friends of Finchley Way Open Space	Para 8.5.1	Day centres need to be well publicised and outreach to those most isolated and lonely is vital. It is these groups who lack the confidence to find out about support and to attend events as they worry about not knowing anyone and having nothing to say.	Agreed although the Plan is not the best vehicle to publicise such services.	No
Finchley Society	Para 8.6.2	The Council may place only 30% of those in care homes in the borough but others are likely to be current Barnet residents who self-refer.	Noted but this does not alter the approach in the Local Plan	Yes
Finchley Society	Para 8.6.3	Last sentence. Barnet is not an island. Adjoining boroughs have to work together. It must not seem as if Barnet 'doesn't want a load of old people being dumped here'.	Agreed but the text reflects that care home places in Barnet are purchased by other local authorities as well as the NHS and private individuals.	No
Finchley Society	Para 8.7.1	Barnet is not an island. Adjoining boroughs have to work together. If the last sentence identifies a real problem the plan has to offer a solution or mitigation for problems identified. Something should be added here.	Agreed. Priorities for provision identified in the IDP to which a cross-reference has been added. Future projects include : New Hendon Library, the expansion of several of the Borough's Libraries, improved signage and building maintenance works New primary and Community Care facility at Colindale and Brent Cross Regeneration Zone Urgent Care Centre at Barnet General Hospital Community based centres at Chandos (commercial nursery), Sweets Way (community based centre), Barnet Playing Fields Centre (mixed commercial and community use), Brent Cross South (community facility (at Market Quarter and Easter lands)), Brent Cross North (community facility), Colindale	Yes

			(community centre), West Hendon (community centre)	
Friends of Finchley Way Open Space	Para 8.9.2	I support the need for assets of community value to be used to show demand for community services and facilities when considering planning applications.	The Council welcomes this support	No
Finchley Society	Para 9.4.11	This is rather a counsel of despair, but may be necessary. The principles in 9.4.12 might however be adopted in LSIS as well.	The Local Plan seeks to safeguard employment land in LSIS and therefore adopts a realistic approach to co-location	No
Former MHNF	Para 9.4.5	We welcome the action you have taken to protect Industrial areas and Town Centres through Article 4 direction.	Support welcomed.	No
Finchley Society	Para 9.4.5	It is a little surprising that the borough expects an additional 67,000 m2 of office space to be required in District Town Centres (beyond the 400,000 m2 to be provided at Brent Cross). The BELR is now three years old, and, given the speed with which work arrangements are changing the research should be revisited before the Plan is finally adopted. New office buildings should be designed as flexibly as possible, so that they can be adapted for residential use if there is a long-term fall in the demand for offices.	The Plan has been revised to reflect the changes to the Use Classes Order and the introduction of Use Class E Commercial Business and Service uses. Given this shift to a more expansive Use Class where B1 offices form part of Use Class E there is little merit in revisiting evidence that was based on more specific use classes.	Yes
Finchley Society	Para 9.5.1	The Council's action to curb permitted development is much welcomed. The analysis should distinguish permissions from actually implemented conversions, and indicate how much office space remains, and what continuing pressure there is for conversions.	The Council welcomes this support. Additional text to highlight the monitoring of the Article 4 Direction in the AMR.	Yes
Barnet Society	Paras 8.12.1-2	Add a reference to the value of open spaces and green infrastructure for physical and mental health and wellbeing, exemplified by city and care farms.	The text in this section of the plan (8.12) already highlights the health and wellbeing value and benefits afforded by open space and green infrastructure.	No
Finchley Society	Paras 8.3.6 & 8.3.9	support the addition of new swimming and other recreational facilities. The new Copthall is heavily used, so much so that booking some classes is very difficult, especially those for older and less physically fit people.	The Council welcomes this support	No
Friends of Finchley Way Open Space	Paras 8.3.6 and 8.3.9	Support the addition of new swimming and other recreational facilities. The new Copthall is heavily used, so much so that booking some classes is very difficult, especially those for older and less physically fit people	The Council welcomes this support	No
Barnet Cycling Campaign	Policy CHW02	The council needs to do more than "Encouraging implementation of the Healthy Streets Approach, as set out in the draft London Plan". It needs to take responsibility and lead on this by directing all possible funding towards healthy streets schemes across the borough.	Agree the need for the Council to take a proactive approach – delete encouraging in part f of the policy.	Yes
Finchley Society	Policy CHW01	CHW01f. While we support Sport England's Active Design Principles, we are wary of some implications - for instance a tendency to try to co-locate community activities inappropriately. CHW01h There needs to be more precision for this Plan to be sound. What will be the procedure and criteria for this allocation? CHW01j Rethink the second leg. People may move into residential care in Barnet to be close to relatives - for instance ex-residents who retired out of London but now need to return. CHW01 Why is the sentence 'The Council will support proposals for new community infrastructure where the following circumstances apply.' so grudging? Replace by 'The Council will support proposals for new community infrastructure unless . .' and follow by bullet points of contra-indications.	The Council aims to ensure that co-location increases access to services. Any sites allocated by the Plan are clearly identified in the Schedule of Proposals The Council's priority is serving the needs of it's existing residents. The wording reflects that the Council wants the right social infrastructure in the right locations	No
LB Barnet Estates (GL Hearn)	Policy CHW01	We propose following addition - (K). The Council will support providers of new and improved facilities within the Borough, such as those at Middlesex University's Hendon campus and will encourage the provision of further and higher education programmes, skills training and continuing professional development programmes, business support initiatives and applied research."	Agreed	Yes



Department of Education	Policy CHW01	Amend part of the policy dealing with proposals for new infrastructure with an additional criterion to ensure that the overall policy approach is sufficiently flexible: "iv. It provides infrastructure in line with wider national policy requirements and local demands."	Agreed	Yes
Barnet Society	Policy CHW01	Add 'medical and dental services' to the 1st paragraph.	Agreed	Yes
HADAS	Policy CHW01	Add new point: <i>k) support development proposals that contribute to, or seek to incorporate, museum/display space to celebrate the history and archaeology of Barnet</i>	Agreed.	Yes
Brent Cross South Partnership (DP9)	Policy CHW01	Para h. states that sites will be allocated to address needs as identified in the Council's Education Strategy. Further clarity is needed at this stage on how and when these sites will be allocated. This policy as well as its explanatory text refers to a growing school/younger population but evidence to support this is not provided in the Education Strategy, which recognises that there has also been an 8% fall in primary demand.	Section on Children and Young People updated with reference to new Education Strategy 2021 to 2024 which reflects that the school population is changing	No
Friends of Finchley Way Open Space	Policy CHW01	f) While I support Sport England's Active Design Principles, in one respect I am wary of their implications. Many community facilities are heavily used and co-location is then inappropriate but I have noticed a tendency to try to co-locate community activities inappropriately. j) This needs to be treated with care as older people may be moving into residential care in the borough to be close to relatives. They may even be ex-residents who retired out of London but now need to return to be closer to relatives.	In making planning decisions we aim to achieve appropriate co-location.  There are existing spaces available to offer such a choice.	No
Middlesex University (Tibbalds Planning)	Policy CHW01	Policy CHW01 makes no reference to further and higher education as part of the range of community infrastructure needed to support a healthy and successful population. We suggest that there is an addition to the policy, along the following lines: " <i>The Council will support providers of further and higher education by: encouraging the provision of new and improved facilities within the Borough, such as those at Middlesex University's Hendon campus; and encouraging the provision of further and higher education programmes, skills training and continuing professional development programmes, business support initiatives and applied research.</i> "	See response to LB Barnet Estates	Yes
JCoSS	Policy CHW01	In the context of this, JCoSS has reviewed the Draft Local Plan (Reg 18) and fully supports the recognition therein that the delivery of schools and educational facilities are needed to accommodate further growth and to make Barnet a great place to live and work for current and future populations. JCoSS also support L B Barnet's acknowledgement that education is one of the largest sectors for employment within the borough. Moreover, JCoSS is supportive of the inclusion of Policy CHW01 (Community Infrastructure) which states that the Council will work with partners, including JCoSS, to ensure that communities facilities such as schools are provided for Barnet's communities in a timely manner. The proposed extension at JCoSS (the application for which is currently being determined) aligns fully with these objectives by helping to meet a documented need for school places, adding capacity to a school with an excellent reputation within and beyond the Jewish community. We trust that these representations will be taken into account and we would be grateful to be kept informed of the Council's progress with the emerging Local Plan.	Support welcomed.	No
Sport England	Policy CHW01	Part d. Consider that the wording of this needs to be tweaked to include 'is surplus' rather than 'has ceased' as a surplus is higher a standard to prove. The policy seeks '..loss or replacement of existing... will only be permitted if: • the replacement facility is equivalent to or better quality and meets the needs currently met by the existing facility' which only partly aligns with the NPPF, paragraph 97, which seeks replacement facilities to be of at least equivalent quality, quantity and in a suitable location. As a result, Sport England does not consider this element to also align with national policy. Rather than 'no longer required' should say 'identified surplus', and in iii rather than 'ceased'.	Agreed.	Yes
Barnet Cycling Campaign	Policy CHW01	Identified need for increased pay-and-play accessible water space, equivalent to 2 new swimming pools (6 lane x 25 m) by 2036. None of the four sites mentioned are in town centres or easily reached by sustainable transport and so they all have large car parks. Safe	The Council recognises the importance of providing safe cycling routes and good public transport to enable people to more easily access community	No

		cycling routes and good public transport needs to be provided. In one of the largest London boroughs with inadequate swimming facilities, having to wait until 2036 for increased provision is unacceptable.	facilities such as swimming pools. The intention is that additional swimming pool provision is provided during the lifetime of the plan up until 2036.	
LB Barnet Estates (GL Hearn)	Policy CHW01	We support the provision of specialist housing to meet the needs of vulnerable residents living in the Borough as set out in Policy CHW01 Part (J).	The Council welcomes this support.	No
Department of Education	Policy CHW01 (h)	Amendment is required to the policy text to ensure consistency with the NPPF, and promote positive planning to ensure that schools are delivered to maximise choice, attainment and aspiration in Barnet. "h. allocate sites for development that address educational needs and demand with reference to up to date evidence as identified in the Council's Education Strategy;"	Agreed	Yes
Department of Education	Policy CHW01€	Clarify that developer contributions may be secured retrospectively when it has been necessary to forward fund infrastructure projects in advance of anticipated housing growth. Amend part e of the policy to read: "e. require development that increases the demand for community facilities and services to make appropriate proportionate contributions towards existing facilities and new and accessible facilities borough-wide, particularly within Barnet's Growth Areas and town centres;"	Agreed	Yes
Barnet CCG	Policy CHW02	Define health impact assessment in the supporting text or glossary as follows:"Health Impact Assessment (HIA) is used as a systematic framework to identify the potential impacts of a development proposal, policy or plan on the health and wellbeing of the population, or particular groups within it. HIA should be undertaken as early as possible in the planning application or plan making process to mitigate any potential negative impacts and maximise potential benefits."	Agreed	Yes
Barnet CCG	Policy CHW02	Define 'larger' developments by way of a housing unit and/or floorspace threshold.	Agreed. Definition added to Glossary. Large scale major – residential develop over 200 units or a site of 4 hectares or more. Non residential development over 10,000 m 2	Yes
Barnet CCG	Policy CHW02	Amend wording of second clause c) to read: Supporting the North Central London Estate Plan and the implementation of NHS Long Term Plan in responding to demand and integration of health and social care, including the use of developer contributions to support investment in healthcare infrastructure."	Agreed.	Yes
Barnet CCG	Policy CHW02	Merge together at 1 <sup>st</sup> part of policy and 2 <sup>nd</sup> clause a) should be merged to read: "The Council will promote the creation of healthy environments and safe, accessible, sustainable and high-quality places which seek to improve physical and mental health and reduce health inequalities. It will ensure that the health and wellbeing impacts of larger development proposals are addressed in an integrated and co-ordinated way through the use of health impact assessments."	Agreed.	Yes
Barnet CCG	Policy CHW02	Supports but suggests revisions to ensure that the policy and supporting text is clear and effective, using the 2017 Director of Public Health Annual Report on the built environment and health to help summarise the issues and impacts. Restructure supporting text to reflect the clauses in the policy, for example neighbourhood design, housing etc.	CHW02 has been revised to be more specific in terms of relevant policies	Yes
Finchley Society	Policy CHW02	CHW02 'to consider' is much too weak, especially following 'requiring'. Amend to 'build'; if it is felt that is too draconian, add 'save in exceptional circumstances, which should be fully justified.' CHW02a This is supported, but 'larger' should be defined.	CHW02 has been revised to be more specific in terms of relevant policies. Definition added to Glossary	Yes
Barnet Cycling Campaign	Policy CHW04	Accident rates have levelled off with about 100 people killed or seriously injured in road traffic accidents in the Borough every year. This policy needs to include targets for 2035 towards achieving the aim of Vision Zero: no KSIs by 2041.	Agreed. Reference added to reducing the number of road traffic accident casualties.	Yes
Finchley Society	Policy CHW04	Many of the measures listed here are admirable, but there is scepticism about their implementation and enforcement. The Plan should indicate the means that will be adopted and the resources that will be put into enforcement. Add street-begging to the list	Contributions from development through S106 and CIL will help deliver these objectives. No merits in a specific reference as street begging is a form of anti-social behaviour. Reference is made to limiting the opportunities for such behaviour.	No

Former MHNF	Policy CHW04	Ten years ago, few in Barnet would have raised concerns over Public Safety. This is far from true today. We do not believe that there are enough CCTV cameras in operation and fully monitored across Barnet, particularly in places with high footfall or where anti-social behaviour is known to be prevalent. Some of these cameras should be mobile such that there can be flexibility in their use. We understand the financial constraints and we are pleased to see pledges to deliver more police on the streets, but crime of all types, including notably violent crime have greatly increased, and the higher the population living in denser sites, the more we can expect crime related issues to arise unless adequate resources (people and technology) are deployed.	The Plan reflects a 'Secured by Design' approach.	No
Finchley Society	Policy CHW05	Perhaps add 'but ones that will positively help it will be supported'.	A change to the wording is not merited	No
Friends of Finchley Way Open Space	Policy CHW05	A2) I do not support proposals for new public houses in growth areas and town centres as part of mixed-use development. I believe that the clustering of pubs results in high levels of crime against the person and anti-social behaviour.	Pubs can make an important contribution to vitality in such locations.	No
CAMRA	Policy CHW05	Welcome support that this plan gives with regard to Public Houses, especially Policy CHW05, section d. Section b; ...vacant for a period of 'at least 24' months should also replace ..'at least 12'. In addition to Review of Public Houses in Barnet 2018 other useful documents to reference in helping pubs survive that set a clear justification for policy need are; 'Pubs and Places', Rick Muir, IPPR 2012 and 'Friends on Tap'. Robin Dunbar et al, CAMRA/ University of Oxford 2016.	Support for policy welcomed. Reference to 24 months marketing added to be consistent with London Plan.	Yes
Former MHNF	Policy CHW05	We support the moves to protect existing public houses, where appropriate. Mill Hill Broadway is strangely unique in that it does not have a pub currently. We would welcome such an addition which would fill a very real social and cultural void.	Support welcomed.	No
Historic England	Policy CHW05	We support the inclusion of a standalone pub protection policy given the cultural and heritage value of pubs. Draft New London Plan policy HC7 on Public Houses tells us that pubs should be marketed for 24 months; we recommend that the policy is amended to reflect this.	The Council welcomes this support. Reference to 24 months marketing added to be consistent with London Plan.	Yes
Mayor of London	Policy CHW05	The Mayor also welcomes Barnet's approach to protecting public houses in line with Intend to Publish London Plan Policy HC7.	We welcome the support	No
DC Rail Ltd (First Plan)	Chapter 9 Oakleigh Road LSIS	Rail freight operating company Devon and Cornwall Rail 'DC Rail' are in the process of securing a lease from Network Rail (NR) in respect of land known as 'Oakleigh Road South Railway Sidings' historically used for transfer of freight by rail and is identified by NR as a 'Strategic Freight Site' ("SFS"). DC Rail intend to reconnect and upgrade the historic sidings to facilitate the reinstatement as fully active freight site which will enable the bulk transport of minerals. These works are to be progressed under rail related permitted development rights Part 8 Class A of the GDPO (2015). Following reconnection of the land to the railway and with the sidings being re-established, the land can then be considered for a wide range of important aggregate, waste and material transfer functions along with associated complementary uses also potentially being considered. The land is currently utilised for a range of industrial and commercial operations and already forms part of an important stock of industrial business floorspace within the borough but not located within the designated 'Oakleigh Road South (Railway yard)' Locally Significant Industrial Site (LSIS) and not proposed to be any changes to the LSIS boundary within the 'Changes to Policies Maps' document accompanying the Draft Local Plan. The LSIS boundary is therefore proposed to maintain its current boundary, immediately neighbouring the site to the north, east and south. Works to re-establish the rail sidings will increase the site's significance and importance for undertaking industrial operations and it is considered that the land forms the function of a LSIS being a site of focus for industrial, storage and distribution and other employment generation sui generis uses. .Given the nature of the site and its proposed future uses for rail related operations as mentioned we wish to ensure that any neighbouring development has no potential to prejudice the future operation of the sidings for rail related purposes. Inclusion within the LSIS will assist in preventing any conflict in land uses in this regard.	A review of the LSIS boundaries will be merited in the next review of the Local Plan when the rail sidings are established	No

Glenroy Estates	Chapter 9  Alston Works LSIS	<p>Amenity of Residential Neighbours - Our client considers it inappropriate and contrary to regional planning policy to re-designate the site as an LSIS in the context of residential amenity and quality of living, especially after the site was released from this designation in 2009. NPPF paragraph 117 notes that planning policies should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land. The LB Barnet 2009 Employment Land Review notes that the site would not attract any B8 occupiers, leaving the possible future uses of the Site within B1b, B1c, and B2 Use Classes if it were restricted by an LSIS designation. Both Employment Land Review documents note that the site is surrounded closely by residential properties. Due to the proximity of residential houses to the site, our client considers a designation which restricts uses to the aforementioned Use Classes would unduly affect the amenity of those living nearby, contrary to paragraph 117 of the NPPF. The area is generally in residential use, and it would be more logical to allocate the site for a mix of less disruptive employment uses and residential use, as these would complement the existing employment stock on site whilst responding to the residential dwellings immediately surrounding the site. Quality of Existing Site has been demonstrated through the Local Plan evidence base that the site is inappropriate for redevelopment as an employment site, as it ranked in the lowest category in the employment land assessment criteria in 2009. The site has the following issues making industrial development inappropriate: Very limited vehicular parking space on site especially for industrial sized vehicles; Poor access and a disjointed building layout results in congestion and over-spill onto the surrounding residential streets; Buildings are small and poorly placed which restricts the potential for large floorplates usually required by industrial uses. This reduces the attractiveness of the site to potential occupiers; Complete land-lock by residential buildings creates conflict with more intense industrial uses and eliminates the possibility of comprehensive employment redevelopment; The buildings on site are old with low floor to ceiling heights; The site is occupied by a range of different, non-industrial uses which have evolved over the years to give the estate a unique character. This assessment is backed up in the 2009 Employment Land Review and since then, the situation has not improved, but rather it has worsened. The updated 2017 Employment Land Review presents similar conclusions to the 2009 document. The draft designation is therefore contrary to paragraph 122 and 123 of the NPPF, which seek to support developments that make efficient use of land, to meet as much of the identified housing need, and to maintain an area's prevailing character. In this case, all evidence notes the site is poorly equipped for industrial use and is situated in a residential area. Indeed, Alston Works is enclosed on all sides by suburban residential buildings, with back gardens adjoining the rear of industrial buildings on site. Considering the surrounding environment, the quality of the existing stock and the current live/work uses on site, our client considers an LSIS designation would intensify the use on site to a point which would be detrimental to the amenity of local residents. Glenroy Estates Ltd is currently working on an updated residential-led mixed use scheme at Alston Works which has evolved from the 2017 pre-application scheme. The introduction of a designation that is not based on appropriate and proportionate evidence will compromise the economic function of the site. Our client strongly requests the designation is removed from the LB Barnet policies map to allow more appropriate uses to come forward in this location.</p>	<p>The Council is guided by the 2017 BELR, and its recommendations which supported the introduction of an Article 4 Direction to safeguard what were previously B1a and B1c uses.</p> <p>With regard to Alston Works the BELR acknowledges the site is congested however it also says that there is a mix of employment uses occurring on site. There are several employment sites across Barnet that are within largely residential areas, however it does not necessarily follow that these sites are bad neighbours to the surrounding residential. Policy D13 of the London Plan also acknowledges such situations. Many such sites also offer services that are of value to the residents as well as ensuring a functioning local job market. As acknowledged by the London Plan employment sites of varying age and quality are important to local economies around London as their rent is often offered at levels which is more affordable to start ups and SMEs and therefore that quality is not reason alone for the loss of employment space.</p> <p>There is flexibility within a LSIS designation for safeguarding creative industries as at Alston Works</p> <p>Paragraphs 8 and 80-82 of the NPPF require Planning policies to recognise the importance of a strong local economy and encourage strong economic growth.</p> <p>Since the 2009 ELR the employment land availability in Barnet has been impacted by the changes to the permitted development rights as well as incremental loss. The Council subsequently brought in a number of non-immediate Article 4 Directions to manage any further loss of employment land. The 2017 BELR supported the justification for the Directions and Alston works was included in the list of sites where Article 4 Directions were confirmed in 2019. It was one of the non designated industrial sites additional to the existing LSIS sites where Directions were confirmed.</p>	No
Finchley Society	Chapter 9	<p>This Chapter should consider retail and service sector employment (now mainly in Chapter 7) alongside industrial and office employment. Jobs in sectors such as construction, home maintenance or transport may not fit in either chapter. There should be more attention to public sector jobs (education, NHS, transport, etc.). A more fruitful approach might be to look at all employment together, examining the relevant sectors in their specific context. This would fit more closely with the perspective of Barnet</p>	<p>The Plan has been revised to reflect the changes to the Use Classes Order and the introduction of Use Class E Commercial Business and Service uses.</p>	Yes

		residents, whose need is for a job that is suitable to their abilities, at an acceptable wage and with good working conditions. The Economy chapter would then cover all employment-creating activities.		
DWD Property & Planning	Section 9.4	Projections for industrial land requirements in Barnet over lifetime of Local Plan have been calculated as part of the LPA's draft Local Plan evidence base, and the key documents are referred to within Section 9.4.1. The Council's evidence base establishes the LPA's forecasted demand for industrial land across the lifetime of the Plan. On the basis of land demand methodology, the London Industrial Land Demand Study (LILDS) estimates that Barnet would need 7.3 ha of industrial land to meet forecast demand across industrial sectors. Furthermore, the West London Employment Land Review (WLELR), using a labour demand methodology, indicates that 13.5ha would be required. Significantly, both studies demonstrate that a significant amount of industrial space is needed in Barnet. It is recognised the economic strategy of the draft Local Plan (set out in Section 9.6.3) relies on the recommendations in the BELR and as such designates seven new LSIS which DWD understands are proposed at: Bittacy Hill (0.8 ha), Coppetts Centre (1.1 ha), Falkland Road (Alston Works) (0.5 ha), Hurricane Industrial Park (0.4 ha), Propeller Way (0.4 ha). Firstly, the wording of the draft Local Plan is not clear as the Plan does not appear to list seven sites. In any event, it is not clear why the recommendations of the BELR were followed instead of the WLELR which sets a higher industrial land requirement based on projections of the labour market over the lifetime of the draft Local Plan. DWD considers that the draft Local Plan fails to be 'justified' as per paragraph 35 of the NPPF as the strategy does not appear to meet the Borough's objectively assessed needs for industrial floorspace over the lifetime of the emerging Plan. It is considered that the draft Local Plan has conservatively planned for the continued growth of the industrial sector and the draft employment policies may constrain the growth of the sector further unintentionally. Our consideration of the implication of the policies is explained further below.	At the time the WELR was in production the additional 7 sites were not designated LSIS they are however functioning non designated industrial sites identified in the BELR. The consultants undertaking the WLELR were made aware of the BELR and the non immediate Article 4 Direction areas which at that point had been made but not confirmed and which included these 7 sites. These sites were therefore grouped together as the non designated sites (along with other non-designated sites identified as part of the study) and included in the analysis of demand for employment land in Barnet. The conclusion being that Barnet was in need of an additional 13.5ha of industrial land in addition to existing land (both designated and non-designated). Taking this evidence into consideration the non designated sites that were confirmed as Article 4 Directions have been identified for designation in the draft Barnet Local Plan.	No
Network Rail	Section 9.4	NR are very keen to protect and get the freight site included in this. We do note that there are no current plans to change this boundary. However, the freight site is without a particular site-specific description. We would like to get it highlighted within Oakleigh Road South Railway, the LSIS, as the following. Reserved as a Strategic Freight Site within railway classification. Potential for future railhead which needs protecting given environmental benefits this would bring by increase of goods and material moving by rail, as a sustainable transport form, rather than road. Zoned within Crossrail 2 safeguarding zone. Industrial and employment uses remain most suitable in the interim, including waste and construction related activities. Given the nature of the site and its potential for future uses we want to ensure any neighbouring development has no effect on the operations of the sidings or any Network Rail Land in the area. Including this freight site within the LSSI will prevent any contradictory land use issues rising.	There is strong policy protection within the Plan through the LSIS and the Crossrail 2 safeguarding	No
Dalton Warner Davis LLP	Section 9.4	Changes to the Policies Map (Reg 18) (January 2020). This document in outlining the amendments to the Proposals Map includes changes to the Garrick Estate to incorporate the addition of Wilberforce House. Of note are the changes proposed to the LSIS designation of the Connaught Business Centre. A small site adjoining the main centre has been added to the designation whilst the existing LSIS designation has been retained from the Adopted Local Plan Proposals Map. The proposed LSIS designation therefore does not reflect the existing situation on-site, where the western section of the Connaught Business Centre has been released for residential-led development as part of the Homebase planning application (ref: H/05828/14). The above discrepancies between the Adopted Local Plan, Draft Local Plan and BELR with regards to the Borough employment land stock and LSIS designations will require review as part of the revisions to the Reg 18 Draft Local Plan. This offers the opportunity for further consideration of the evidence base and the resultant LSIS site designations in the Draft Local Plan including the Site.	Reviews of individual LSIS boundaries are not merited at this stage. There is sufficient flexibility within Policy ECY01 with regard to the existing situation.  This is more appropriately considered through a full review of all LSIS designations when the Local Plan is next reviewed	No

Finchley Society	Section 9.6	In view of the probable continued decline in industrial activity in the borough, is it justified to retain all of the LSIS? Where sites become vacant, might it be appropriate to consider whether they might be put to better use for residential development?	The Local Plan seeks to retain and safeguard employment land in order to support business and future jobs growth.	No
Finchley Society	Policy ECY01	ECY01j(iv) Replace 'an unacceptable impact' by 'any adverse impact' on residential amenity. 'unacceptable' can be a vague term which would give developers an opportunity to prevaricate.	Agreed. The Plan has also been revised to emphasise Agent of Change principle more clearly	Yes
DWD Property & Planning	Policy ECY01	LPA's strategy for allocating employment land appears to be insufficient to meet the projected requirements for floorspace over the lifetime of the Local Plan and does not contain sufficient flexibility to take advantage of additional development opportunities on non-designated industrial sites in conflict with national policy. We also consider that the draft wording of policy ECY01 is overly restrictive and would likely generate unanticipated consequences in its current form. We consider the policy could be reworded into a permissive condition that would give the LPA more flexibility in determining applications for employment uses outside of LSIS which would truly encourage the redevelopment of acceptable sites.	Barnet's designated LSIS are the focus for employment focussed development, where industrial land uses and office space will continue to make a valuable contribution to the local economy. In addition to safeguarding employment land the Council will consider proposals outside of LSIS that will contribute to a vibrant local economy.	Yes
DWD Property & Planning	Policy ECY01 (J)	Draft wording of section j of policy ECY01 is fundamentally flawed and would fail to meet the tests of soundness. Section j of the policy is updated to read: "Supporting new employment space outside of the locations outlined in (a), (b) and (c) if the following criteria are met: The new employment use would contribute towards the Council's regeneration objectives Employment uses which generate high levels of movement should be located in close proximity to tier one and two roads The new use does not have an unacceptable impact on residential amenity The site is not allocated for an alternative use including residential, education or community uses". Policy could be updated to benefit the LPA in assessing applications and facilitating development Section J of the policy should reflect that there are other sites in the Borough that are not designated as LSIS that would also be suitable industrial sites, including various sites that would be classified as 'white land' where no specific policy allocation would apply, including out of town retail facilities. Draft wording of Section J would fail to meet the national tests of soundness and is overly restrictive which would preclude the development of appropriate sites outside of LSIS to provide valuable contributions to industrial land in Barnet. Requiring developers for proposals outside of LSIS to meet the aforementioned tests would fundamentally not create conditions in which businesses can invest, or indeed support economic growth. This section of the policy should be deleted.	Agreed	Yes
DWD Property & Planning	Policy ECY01	Constraining the potential of appropriate sites in the Borough through the application of draft policy ECY01 would limit the sustainable economic growth the LPA is seeking to facilitate. Draft Local Plan does not meet the national tests of soundness, propose that the relevant section of policy ECY01 is reworded.	ECY01 reworded to clarify that the Council is seeking a vibrant local economy across the Borough	Yes
Sport England	Policy ECY01	Quoting the impact of sport on the economy and as an important employer, it is suggested that the Plan should consider D2 sports uses and/or sport and recreation facilities to be acceptable on employment sites and not just focus on B uses.	Former D2 uses now form part of the wider E Commercial Use Class and continue to be encouraged in town centres – see TOW04.	No
DWD Property & Planning	Policy ECY01	Contest that any employment space outside of town centre/edge of centre and LSIS locations should be 'small-scale' as set out in section ii of the policy requirement for 'small-scale' development is removed.	Large scale sites suitable for employment use should be identified in the plan as a site proposal.	No
DWD Property & Planning	Policy ECY01 (iii)	section iii suggests any new employment space outside of designated areas should be part of a 'meanwhile use'. This would preclude significant investment in the Borough for potential owner/occupiers of industrial schemes.	New employment space being provided as part of a meanwhile use is likely to be supported, rather than this being a requirement.	No
Redrow Homes	Policy ECY01	Part a) should be amended to allow the loss or re-provision / rationalisation of office space with a TC if it can be demonstrated that there is no demand. Part d) should also include the potential for co-location of residential uses within certain LSIS's (Policy E7 of draft London Plan).	Part a) considers if the site is no longer suitable or viable – which includes 'demand'. Policy E6 does not include residential as part of co-location uses within LSIS.	No
St William Homes LLP	Policy ECY01	We welcome the preferred approach of Policy ECY01 'A Vibrant Local Economy'; however, as set out in para 14 of this representation, flexibility will need to be applied to former utility sites (usually Sui Generis).	Support welcomed. There is no need to make specific reference as there is flexibility enough in the Local Plan to consider former utility sites.	No

Harrison Varma Ltd	Policy ECY01	As currently worded, as well as safeguarding office space in Town Centres and edge-of-centre locations Policy ECY01 will require any proposal to replace office accommodation anywhere else in the borough to demonstrate a lack of existing demand through provision of evidence of at least 12 months of vacancy and marketing. Since October 2019, a number of areas within the Borough have had an Article 4 Direction applied to remove permitted development rights to change from office to residential use. In applying those Directions, the Borough has chosen to allow the permitted development right to be maintained in many locations. Given this, it is suggested that Policy ECY01 should only apply to those locations that are specifically designated for the protection of existing office accommodation and/or where the Article 4 Direction applies. Outside of these locations, the principle of replacing office accommodation should be acceptable if it delivers on other priorities of the Local Plan. Most notably, this could be the optimisation of sites for residential development.	The Article 4 Direction is a response to the Government's changes to permitted development of office to residential. It covers the sites that are most important to the economic sustainability of the Borough. It does not confirm the Council's support for permitted development elsewhere. The poor quality of office to residential is well documented in Barnet's Article 4 Direction and the impact it has on quality of life is amplified by the COVID19 lockdown. The Local Plan seeks to work with developers to optimise housing delivery and considers that this is best done through the application of planning policies including Policy ECY01.	No
Mayor of London	Policy ECY01	Whilst the Mayor strongly supports Barnet's policies that protect and seek to intensify industrial land, it should be noted that he has raised concerns to other West London Alliance boroughs regarding the West London Employment Land Review (WLELR). As noted in Local Plan paragraph 9.4.8 the methodology for forecasting industrial demand in the WLELR uses a labour demand methodology which does not follow the economic demand methodology at set out in the London industrial land demand study 2017, which has been accepted by the London Plan Examination Panel. In addition, the methodology for the WLELR does not take into account the demand for waste and transport over the plan period. The Mayor welcomes Barnet's acknowledgement that the London wide strategic evidence and the WLELR both identify a demand for additional industrial capacity in Barnet. Barnet has responded positively to this evidence by designating additional Locally Significant Industrial Sites (LSIS) and generally only allowing industrial uses within these areas. The Mayor would also welcome the intensification of these areas in line with draft Local Plan Policy ECY01d). The Mayor has no objection to the de-designation of LSIS where the area no longer functions as a predominantly industrial area. However, to protect remaining well-functioning industrial sites Barnet should include a policy on non-designated industrial land or refer to Intend to Publish London Plan Policy E7C. In this regard Barnet's Site Allocations should not allocate non-designated industrial sites for other uses so that their potential for continued industrial use can be fully assessed. The Mayor also welcomes the approach in draft Local Plan Policy ECY01c) limiting office use within LSIS to an ancillary use. It should be made clear that any office use should be ancillary to a business operating within the LSIS. The protection of Class B1(a) floorspace as set out in proposed Local Plan Policy ECY01h should not apply to LSIS where it can be replaced with an industrial use such as B1(c) floorspace. The Mayor strongly welcomes the design criteria set out in draft Local Plan Policy ECY01k requiring all employment space to be designed to appropriate floor to ceiling heights and space requirements for the intended uses including on site servicing and space for waiting or goods vehicles.	The text also clarifies that both studies demonstrate that industrial space is needed in Barnet and safeguarding of existing industrial land is important.  The text and policy has been amended to allow for intensification and co-location of industrial -uses while ensuring that these do not limit the functioning of the industrial sites.  ECY01(h) relates to existing Article 4s within the Borough.  London Plan Policy E7C has been included into ECY01 (i)	Yes
New Barnet Community Association	Policy ECY01	400,000 sqm of office space at Brent Cross seems excessive and disproportionate to the rest of the Borough	This figure reflects the existing planning consent	No
Mayor of London	Policy ECY01	As set out above, beyond the indicative job figures set out in Intend to Publish policy SD1 for Barnet's Opportunity Areas, Policy E1 directs offices to town centres and notes that there is limited demand for office development in outer London. The Mayor welcomes draft Local Plan Policy ECY01 which seeks affordable workspace where office uses are no longer suitable or viable. This approach could extend to general B1(c) light industrial where there would be no adverse environmental impacts on existing and nearby occupiers.	We welcome this support. ECY01 revised to reflect changes to the Use Classes Order	No

Ropemaker Properties	Policy ECY01	ECY01 currently resists 'co-location' at LSIS sites (including GRIE), which appears to be on the basis of the agent of change principle. SoS's letter to the Mayor directs that Policy E4 should be redrafted to focus on the overall supply of industrial capacity rather than its retention on a site by site basis.	Within the LSIS designation, the Council expects any proposal for co-location to overcome any conflict with existing and emerging policy as set out in Barnet's Development Plan, which includes the London Plan..	No
Mayor of London	Policy ECY02	The Mayor supports Barnet's aim to deliver a range of business space as well as to secure affordable workspace. Proposed Policy ECY02 should distinguish between the two as set out in Intend to Publish London Plan Policies E2 and E3 and set out the specific requirements for affordable workspace in line with Intend to Publish London Plan Policy E3.	Agreed. Policy revised	Yes
Finchley Society	Policy ECY02	This policy, or the Plan elsewhere, should encourage a greater land use mix, so that walking or cycling to work is practicable. The connection between employment opportunity and the need to commute is missing from the Plan. In Finchley, unless people commute, almost all the opportunity exists in servicing activity.	Agreed. The Local Plan response to COVID 19 seeks to encourage more sustainable forms of transport for accessing work within Barnet and nearby.	Yes
Finchley Society	Policy ECY02	ECY02a Delete 'or low-cost'. The distinction between 'affordable' and 'low-cost' is explained in paragraph 9.7.2, where it is stated that the two types of workspace are not interchangeable. A developer should not be able to meet the obligation in ECY02a by developing a category of low-quality space which is then let at 'low cost' (i.e. cheaply).	Agreed. Wording revised to be more consistent with London Plan	Yes
Former MHNF	Policy ECY02	We welcome policy ECY02 which shows initiative in providing 'Affordable Workspace' and trust that this may also apply to the supply of studio space for artists and not just for office-based businesses and their staff.	Support welcomed.	No
St William Homes LLP	Policy ECY02 & ECC05	An alternative option of 'no policy' is suggested for Policies ECY02 and ECC05. These are merely repeating both national and regional policy and therefore are not needed.	Comment noted.	No
Barnet Cycling Campaign	Policy ECY03	To support policy ECC01 (Mitigating Climate Change) this policy should include supporting jobs in the industries and infrastructure we need to tackle the climate crisis.	This can be promoted through the emerging Employment and Skills Strategy	No
Pocket Living	Policy ECY03	Additional text should be added to the policy: 'In exceptional circumstances, where the nature of the site or development does not support delivery of these target, the council will seek a realistic agreement that recognises the site and development circumstances.'	Reference to exceptional circumstances is already made in supporting text and within Policy ECY03	No
Redrow Homes	Policy ECY03	Support	Welcome the support	No
Glenroy Estates	Table 14	Glenroy Estates Ltd is a property development company and major landowner in London and is the freehold owner of Alston Works at Falkland Road. Glenroy has an interest in bringing forward a planning application for the mixed use residential led redevelopment of Alston Works. Our client received written pre-application advice from LB Barnet in August 2017 regarding the demolition of some of the existing employment buildings on site and the development of a mixed-use residential led scheme. The principle of residential use on this site was considered acceptable subject to design and privacy matters and the retention/re-provision of appropriate levels of employment floorspace. The site comprises several former commercial and industrial buildings with associated yard space and car parking between the buildings. The quality of these buildings varies as does the height. The height ranges between 1 to 4 storeys. The buildings are predominantly in use as live work units on the upper floors, with some employment uses throughout the site on the ground floor including a car repair garage. The site has 3 vehicular and pedestrian access points, two from Falkland Road to the north and one from Alston Road to the south. The site is closely surrounded by 2-3 storey terraced housing and is in a sustainable location approximately 300 metres from the centre of Chipping Barnet. The site has a PTAL of 2. The buildings on the site are not listed, locally listed nor within a conservation area, but the site is located at the northern most point of the borough approximately 200m to the south of a large expanse of Green Belt land, Planning permission, LPA ref. B/02621/13, was granted at the site in May 2014 for the continued use of 30 units within the existing buildings as live work units. According to the latest figures published	Barnet's designated LSIS are the focus for employment focussed development, where industrial land uses and office space will continue to make a valuable contribution to the local economy. In addition to safeguarding employment land the Council will consider proposals outside of LSIS that will contribute to a vibrant local economy.	No



		by MHCLG, LB Barnet failed to meet the 95% housing delivery requirement between 2016 and 2019. The Borough has now produced an action plan identifying the causes of under-delivery and a way to address it. The Draft Local Plan seeks to designate Alston Works as a Locally Significant Industrial Estate. Our client strongly opposes this designation as it does not accurately reflect the current uses on site, nor the prevailing character of the local area. The Draft Local Plan seeks to designate Alston Works as a Locally Significant Industrial Estate. Our client strongly opposes this designation as it does not accurately reflect the current uses on site, nor the prevailing character of the local area. There are a number of material planning considerations that must be taken into account when deciding whether the site is suitable for a stronger industrial designation by the draft Plan.		
Natural England	Chapter 10	There may be further opportunity for thinking on Natural Capital within the Local Plan. We suggest that an additional objective could address Natural Capital, such an objective might be “to conserve and enhance Barnet’s natural capital and ecosystem services”. It could also be considered as a cross-cutting theme. Opportunity mapping work for natural capital and habitat networks could be undertaken to inform the plan and Sustainability Appraisal, supported by baseline and opportunity mapping. We consider that Green Infrastructure and Natural Capital are closely linked and can be delivered side by side. The role of the planning system in recognising the wider benefits from natural capital is highlighted in NPPF para 170. Spatial planning at this scale is an ideal opportunity to assess the existing Natural Capital of the Borough (see NPPF para 171), to plan to conserve those features providing key ecosystem services and address deficits. Natural England recently published the Natural Capital Atlas. As well as providing a baseline against which to measure change, the Natural Capital Atlas can be used to understand which ecosystem services flow from different ecosystem assets across England. The atlas shows where there are both strengths and weaknesses in the quantity and quality of ecosystems. This can inform opportunity mapping of where to enhance existing natural capital and where to target its creation for the provision of multiple benefits.	The Vision and Key Objectives have been revised to integrate the natural environment into the urban landscape, improving access to, and enhancing the contribution of biodiversity, Green Belt, Metropolitan Open Land and green and blue infrastructure,	Yes
Natural England	Chapter 10	Natural England focusses our advice on embedding biodiversity net gain in development plans, since the approach is better developed than for wider environmental gains. However your authority should consider the requirements of the NPPF (paragraph 72, 102, 118 and 170) and seek opportunities for wider environmental net gain wherever possible. This can be achieved by considering how policies and proposed allocations can contribute to wider environment enhancement, help adapt to the impacts of climate change and/or take forward elements of existing green infrastructure, open space or biodiversity strategies. Opportunities for environmental gains, including nature based solutions to help adapt to climate change might include: Identifying opportunities for new multi-functional green and blue infrastructure, Managing existing and new public spaces to be more wildlife friendly (e.g. by sowing wild flower strips) and climate resilient, Planting trees, including street trees, characteristic to the local area to make a positive contribution to the local landscape, Improving access and links to existing greenspace, identifying improvements to the existing public right of way network or extending the network to create missing footpath or cycleway links, Restoring neglected environmental features (e.g. a hedgerow or stone wall or clearing away an eyesore), Designing a scheme to encourage wildlife, for example by ensuring lighting does not pollute areas of open space or existing habits. Any habitat creation and/or enhancement as a result of the above may also deliver a measurable biodiversity net gain.	Agree – examine how the Plan Policies & Site Allocations can contribute to wider environmental enhancement.	Yes
Natural England	Chapter 10	Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds. Local ecological networks will form a key part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks. Planning positively for ecological	Agree – supporting text of Policy ECC06 revised	Yes

		networks will also contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in paragraph 171 of the NPPF. Where a plan area contains irreplaceable habitats, such as ancient woodland, ancient and veteran trees, there should be appropriate policies to ensure their protection. Natural England and the Forestry Commission have produced standing advice on ancient woodland, ancient and veteran trees. Please note that your borough contains sections of ancient woodland but there is currently no mention of ancient woodland in the Local Plan. We recommend appropriate addition of policy protection for these areas of woodland.		
Natural England	Chapter 10	Include policies to ensure protection and enhancement of public rights of way, as outlined in paragraph 98 of the NPPF. Recognition should be given to the value of rights of way and access to the natural environment in relation to health and wellbeing and links to the wider green infrastructure network. The plan should seek to link existing rights of way where possible, and provides for new access opportunities. The plan should avoid building on open space of public value as outlined in paragraph 97 of the NPPF.	Ensuring Barnet's network of public rights of way are protected and enhanced as a means for walking is a crosscutting feature of the Local Plan	Yes
London Diocesan Fund (Iceni Projects)	Chapter 10	A key priority of the Council's Growth Strategy is to deliver social infrastructure to support growth through ensuring that schools and leisure, health and community facilities are delivered to support areas of growth and regeneration. By 2036, the borough will see a 4% increase in the number of young people aged 0-19 to 103,000. The Council are seeking for the majority of schools to come forward within the Growth Areas, therefore it is likely they will take longer to be delivered. Further to this, there is no clear Infrastructure Plan which demonstrates how needs for schools will be met in the Local Plan. The council need to seek a more proactive approach to delivering this and extending Mount House School provides a short-term opportunity to meet educational and recreational needs in the Borough. Greenfield sites in particular can provide larger school grounds with a greater range of recreational facilities on site, which aren't available at other schools in the area, which makes this site more appealing to Barnet when deciding where to focus development through the emerging Local Plan. Recently, both the Department for Education (Securing Developer Contributions for Education) and CLG (revisions to Planning Practice Guidance) have published guidance on collecting developer contributions to fund new school places. This is part of a significant shift of emphasis away from Central Government funding the bulk of new school places towards a situation whereby developers will be expected to deliver them, where it is directly arising from new housing growth. Up until now, the Free School Programme has been heavily funding the delivery of new schools, with 442 schools open and a further 262 in the process of opening since 2010. The Free School Programme now appears to be decelerating and in the future it is expected to be smaller and focused on assisting with Government objectives of improving social mobility. This does not mean that England does not need more schools; housing targets in new Local Plans will create a need for new schools - but as this need is perpetual Central Government will increasingly expect developers to pay for it. This policy change will also have wider ranging implications for both local authorities and developers when identifying new sites. Local authorities will need to be robust when identifying where schools will be located and the level of growth they will need to meet. The feasibility of new schools will require proper testing at Local Plan stage as Central Government will no longer provide a fallback position to deliver schools on a windfall basis. In order to determine how to deliver sufficient school places in the Borough for state and independent schools, the Council should set out a clear plan on how and where they intend to address this emerging need. This is required by NPPF para 94 which requires that local authorities take a proactive approach in their Local Plan to expand choice for school places. Given that new residential development is identified in built up area, the ability to deliver schools on these sites will be limited and Green Belt sites will be required to ensure that enough school places can be delivered within the relevant timescales. Failure to do so could leave Barnet in a position whereby they cannot deliver sufficient school places as they do not have sufficient land or funding. The Council has produced an Indoor Sports and Recreation	The Council's priorities for new school provision are expressed in the Educational Strategy 2021- 2024 and this is reflected in Chapter 10 of the Local Plan as well as the Infrastructure Delivery Plan.	No

		<p>Facilities Study which provides an assessment of the needs for a range of indoor sports facilities in the Borough. The Strategy is intended to guide future provision of indoor sports facilities to serve existing and future residents in the Borough. This states that although the Borough has good sports facilities, there are some ageing facilities which will require replacement/ refurbishment in the plan period. Based on the quality audits and assessments, supply and demand, and the needs analysis, the priorities for future investment in facility provision are:</p> <p>Sports Halls • Increased community access to existing sports hall facilities; • Secured access for community use incorporated as part of planning conditions; • Long term replacement / refurbishment of ageing facilities. Swimming Pools • Increased swimming pool provision; Gymnastics and Trampolining • Potential to explore further provision given high numbers on waiting lists. The Council place an emphasis on both increasing community access to existing facilities and the replacement of ageing facilities, although in the absence of an Infrastructure Delivery Plan it's not clear how these facilities will be funded and thus when they will be delivered. Rectory Farm provides an opportunity to deliver new and well-designed sports facilities in the short-term as part of a wider expansion of Mount House School whilst delivering much needed family housing. The Diocese are in discussion with the school to provide part of the site for a sports centre and they have confirmed support for community use.</p>		
Natural England	Chapter 10	<p>The Local Plan should be underpinned by up to date environmental evidence. This should include an assessment of existing and potential components of local ecological networks. This assessment should inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, and that the mitigation hierarchy is followed and inform opportunities for enhancement as well as development requirements for particular sites. Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here: Habitats and species of principal importance in England. Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area. Protected species are those species protected under domestic or European law. Further information can be found here Standing advice for protected species. Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.</p>	<p>The Local Plan is supported by the London Environment Strategy and the London BAP. The Council intends to commission a Barnet BAP as part of it's actions for biodiversity enhancement.and looks forward to working with Natural England on it's production.</p>	No
Natural England	Chapter 10	<p>The plan should make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in NPPF para 96. Natural England's work on Accessible Natural Greenspace Standard (ANGSt) may be of use in assessing current level of accessible natural greenspace and planning improved provision.</p>	<p>Supporting text for Policy ECC04 makes reference to the Accessible Natural Greenspace Standard (ANGSt)</p>	?
Middlesex University (Tibbalds Planning)	Chapter 10	<p>As a significant stakeholder and user of the facilities, the University welcomes the identification under Para 4.24.3 of the Cophthall Playing Fields and Sunny Hill Park as one of three major sports hubs within the Borough and the need for ongoing improvements to the sport and recreation facilities in this location. The University requests that it is fully included in future consultations over these improvements and wishes to stress, in particular, the need for better public transport access to the facilities in this location.</p>	<p>The Council welcomes this support and will ensure engagement with the University with regard to Cophthall and Sunny Hill Park</p>	No
East Finchley Community Trust	Chapter 10	<p>East Finchley ward's only local park Cherry Tree Wood has suffered considerable neglect in recent years voluntary activity to rectify this needs to be supported by a borough plan. Play space in Market Place (adjacent to the The Walks) has also suffered from lack of investment. Welcome inclusion of more details to enhance local walking routes (known as The Walks) and to encourage the use of these routes and to explicitly link them to the local park and a strategy for greening The Walks and upgrading the play space in Market Place and investment in Cherry Tree Wood. There are other vital fragments of green space such as the Community Garden outside East Finchley tube which is a haven for pollinators which could benefit from being linked to a "green corridor". New development at Prospect Place East</p>	<p>The Local Plan includes policies that seek to protect and enhance parks, open spaces and green infrastructure corridor linkages. This level of detail is more appropriately articulated at the neighbourhood planning level and is therefore an option for the Trust to pursue.</p>	No

		Finchley adjacent to The Walks every effort should be made to develop green space around this area and to make a “green corridor” through the ward to the local park. There are other vital fragments of green space such as the Community Garden outside East Finchley tube which is a haven for pollinators which could benefit from being linked to a “green corridor”.		
Wade Miller-Knight	Chapter 10	Plan has missed opportunity to establish a Nature Corridor along the Silk Stream and also queries land between Dollis Brook and Totteridge Lane not being put forward for development as not valuable open space for nature or public amenity.	The Silk Stream is included as a Grade II Site of Borough Importance and is also included in Policies GSS06 and ECC06 to ensure restoration and protection. Annex 1 also refers to Silk Stream improvements alongside any proposed development.	No
Friends of Finchley Way Open Space	Chapter 10	I support policies to improve air quality and reduce carbon emissions and to generally mitigate against climate change. I also support noise reduction measures as continuous noise, even at a low level, can have mental health impacts.	This support is welcomed	No
Former MHNF	Section 10.3	The most worrying issue in this section is the lack of recent activity to address air quality across Barnet. We assisted the Council and UCL (2016) in an exercise to establish the levels of Air Quality in some 60 location across the borough. Little or nothing has apparently happened since, to address the issues which highlighted air quality at levels as much as 150% above EU maxima.	Requirements for Air Quality Assessments and Air Quality Neutrality have been updated.	Yes
Former MHNF	Section 10.4	For those with private vehicles the recycling centre at Summers Lane is of great benefit. Many people call for the reintroduction of occasional skips in housing areas, notably for the benefit of those who cannot transport items to Summers Lane. However, we are experiencing increasing levels of fly-tipping and this requires strict levels of enforcement, which should be paid for by a reduction in the need to clear-up after the culprits.	The Council continues to use its legal powers to take action against fly-tipping.	No
Friends of Finchley Way Open Space	Section 10.4	The recycling facilities in the borough need up-dating and expanding. In particular it is the only London borough that does not collect food waste, for which there is a market in heat generation. The state of the streets in the borough is a disgrace and compares very badly with other boroughs, including some inner city boroughs. A revised street cleaning and domestic bin provision strategy is urgently needed. This is a serious health matter. The Council should consider making access to local recycling centres free to industrial users to reduce the incentives to fly tip. Weighed against the cost of clearing fly tipping, surely it would be cost effective.	The food waste collection service was suspended in November 2018, as there was a need to review how the recycling and waste services could be delivered in a way that is both economically and environmentally beneficial. The council is working to reintroduce the food waste service from April 2022, and this is included in its Reduction and Recycling Plan submitted to the Mayor of London.	No
Natural England	Section 10.5	We welcome the consideration of climate change and recommend the Local Plan highlights the role of the natural environment and nature based solutions in mitigation and adaptation to climate change.	Agree – text revised	Yes
Natural England	Section 10.5	A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para 171 of the NPPF. Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery. Evidence of a strategic approach can be underpinned by Green Infrastructure Strategy. We note that your authority has a Green Infrastructure SPD although we have not reviewed this SPD in relation to the Local Plan. We encourage the provision of green infrastructure to be included as a specific policy in the Local Plan or alternatively integrated into relevant other policies, for example biodiversity, green space, flood risk, climate change, reflecting the multifunctional benefits of green infrastructure.	Barnet has demonstrated a strategic approach to Green Infrastructure through its SPD in 2018. This approach is further strengthened by the policies in this Local Plan.	Yes
Natural England	Section 10.5	Natural England recently published a 2nd edition of its Climate Change Adaptation Manual which includes a Landscape Scale Climate Change Assessment Tool. This tool can be used to identify natural assets (e.g. different habitats and species) in the borough and identify adaptation responses that can be incorporated into a plan to create a resilient landscape across the borough. Consideration could also be given to whether the plan recognises the role of ecosystems and soils in carbon sequestration. A	Agreed. Text revised.	Yes

		strategic assessment of natural assets and Green Infrastructure across the borough can be useful in planning for increasing borough resilience to climate change.		
Former MHNF	Section 10.5	We are supportive of the Council's activity to protect Green Belt and Metropolitan Open Land and their Parks and Open Spaces strategy. In the latter we have seen sites such as Cophall Open Space sectioned off to competing sporting demands so that there is little or none of the area left for walking or enjoying a picnic. Certainly, areas of Green Belt and Metropolitan Open Land must be robustly defended against the development of hard structures that remove the primary purpose of such spaces as the lungs of London, performing a vital role in improving air quality. We think you should provide a new Green Belt/Metropolitan Open Land map for Barnet after the changes you have proposed are accepted. We would like to see 'urban greening' being adopted notably in Town Centres to hide some of the less attractive areas. For example, the M1 motorway bridge is an example of a really brutal civic infrastructure that dissects Mill Hill's Town Centre. A green wall would go some way to making the bridge less unsightly, and it would help improve air quality.	A Neighbourhood Plan could highlight in more detail such 'urban greening' measures. This would enable prioritisation of CIL receipts to invest in such improvements.	Yes
Former MHNF	Section 10.5	We also welcome appropriate encouragement for local people and landowners to grow more food in the spaces available. We think that the Council should drive an initiative for local energy generation as other Councils have done. For example, solar panels could be installed along major roads such as the M1 and A1 to generate electricity and reduce noise pollution. The Council could benefit from interest free loans available to public bodies for energy generation on public buildings such as schools, libraries etc. This would deliver a real reduction in heating/lighting costs, would reduce carbon footprint dramatically and would help with overall budget constraints.	These are innovative ideas that are best addressed in the Council's emerging Sustainability Strategy	No
Elizabeth Silver	Para 10.2.13	Replace "with any loss of trees....adequately compensated" With: "with any loss of trees... not to be compensated by paying a levy into a fund. Re- greening has to be done visibly, on the same site. The public should be able to verify that funds for re-greening are being used in the same time frame, in the area for which they were meant.	Policy ECC01 seeks to minimise Barnet's contribution to climate change through a range of measures. In instances where carbon targets for a development cannot be fully achieved, a financial contribution will be sought.	No
Finchley Society	Para 10.2.14	'all' in the last line seems overdoing it. Surely there should be a minimum size - excluding at least 'householder' ones.	This has been amended to refer to developments minor and greater in size.	Yes
Finchley Society	Para 10.2.2	This para should be stronger. 'will be required as appropriate to' instead of 'is encouraged to', and 'will be required to provide for the building to be' for 'should also consider how the building could be'.	Agreed.	Yes
Finchley Society	Para 10.2.8	This should be accepted in exceptional circumstances only. Developers are expected to meet zero reduction targets.	This statement is in accordance with London Plan net zero carbon policy	No
Environment Agency	Para 10.3.12	Barnet's main water courses are of fair to poor chemical quality according to the Environment Agency. The sentence above is inaccurate, and may be using out-of-date terminology. The Water Framework Directive ecological status data should be used to qualify the current condition of watercourses in Barnet. The three WFD designated river waterbodies (listed below) in Barnet are currently at 'moderate' ecological potential, with the aim to reach 'good' ecological potential by 2027. <ul style="list-style-type: none"> <li>• Silk Stream and Edgware Brook (GB106039022970)</li> <li>• Dollis Brook and Upper Brent (GB106039022980)</li> <li>• Pymmes Brook upstream Salmon Brook confluence (GB106038027940)</li> </ul> The WFD classification data takes into account biological quality, hydro morphology and chemical quality. The current status data is from 2016 but we are currently finalising the 2019 data. The Reasons for Not Achieving Good or RNAG are available via our Catchment Data Explorer website.	Agreed	Yes
Environment Agency	Para 10.3.13	could be improved by specifying the range of reasons the watercourses are currently unable to achieve good potential. For example, the reasons include polluted runoff from roads and urban areas, development encroaching onto river corridors, heavily modified channels and banks, obsolete weirs,	Agreed	Yes

		culverts, sewage outfalls or discharges, domestic plumbing misconnections, invasive species and water abstraction.		
Canal & River Trust	Para 10.3.15	Support the proposal to create a new strategic green chain and walking route from Edgware to the Welsh Harp	Support welcomed	No
Environment Agency	Para 10.3.16	We welcome para 10.3.16 where it recommends >10 width of buffer zone, however we think this standard should be included in Policy ECC02. We would recommend a caveat with regards to tall buildings that wider buffer zones may be required to mitigate for the impact of over-shadowing of the watercourse corridor where tall buildings are proposed. We would also recommend a stronger statement is made in reference to achieving buffer zones that any reduction in width from the 10 metres requirement would have to be fully justified. Where reduced buffer zones are proposed, additional measures to improve biodiversity proposed on-site such as green spaces, tree planting, sustainable drainage measures or off-site compensation will be required. We also welcome the reference to naturalising rivers e.g. removal of hard structures. We strongly recommend a sentence includes that the Environment Agency has identified WFD action measures for each WFD designated watercourse, and these are available on request. The Thames River Basin Management Plan (2015) should be referenced as the Plan setting out objectives to improve waterbodies.	Agreed	Yes
Environment Agency	Para 10.3.5	We recommend amending this paragraph to include 'groundwater' or 'groundwater aquifers' alongside the reference to watercourses, and in some places the two water systems are interlinked i.e. the watercourses are potentially in hydraulic continuity with the aquifers.	Agreed	Yes
Finchley Society	Para 10.5.10	The BPOSS may have used flawed methodology in identifying 'low quality/low value' sites. As result, assessment for alternative uses should be very cautious. For example, in Finchley, Windsor Open Space is categorised as 'Low/Low'. Yet this park is widely used and treasured by residents otherwise extremely short of green space. It is also on a major London walking path. The similar classification of Village Road Open Space is also wrong – it is at the heart of the Finchley Village Conservation Area. However, the policy of alternative use may be applicable to Church End Gardens ("Poor/Fair") which is underutilised and poorly located. This park could be sold for residential development with funds used for a similar amount of better located open land.	BPOSS forms part of the Local Plan Evidence Base and therefore will help in planning decision making as will other material considerations such as any re-assessment of a BPOSS site.  The Council is intending to review the BPOSS and this review will feed into a future planning policy framework for Barnet.	No
Elizabeth Silver	Para 10.5.13	Insert: Accessibility enhancements should avoid pay-for activities (such as mini-golf or zip wires) and activities which increase concreted areas, such as BMX/ skate parks. Explanation: Pay-for and commercial activities discriminate against low-income groups and those who wish to enjoy unspoilt natural and semi-natural spaces.	The Council aims to provide a range of parks, open spaces and leisure facilities across the borough to suit the needs of all users. ECC04 seeks to optimise the benefits of open space and create more accessible green spaces through a range of measures.	No
Friends of Windsor Open Space	Para 10.5.13	My response to the draft plan is with huge concerns. I am highlighting the past experience and the future regarding 'joint usage' paths through 'The Loop' as mentioned in the new Draft Plan. The Draft Plan proposes cycle routes throughout the 'Loop.' (Now known as the Dollis Valley Green Walk). This 90 year old walk was created by a Finchley Councillor Alfred Pike who envisaged a Green Corridor throughout the Borough. It was called 'Brookside Walk' and was built mainly on the Finchley side up to Westbury Road. The Walk was undisturbed as a walk (uninterrupted for over 70 years) as such the footpaths were legally established as a 'right of way'. At present it is a predominantly pleasant 10 mile 'Wildlife Corridor.' This walk was originally intended for pedestrians not cyclists or horse riders. The Dollis Brook forms an important ecological corridor through Barnet, providing habitats for many plants and creatures. Its original Aim in 1992- as set out in a flyer to educate the public. It forms part of Barnet's network of waymarked paths. The Dollis Valley Green Walk is a walk suitable for a wide range of people, from families with children to the more energetic. Most of the route is moderately flat and surfaced and is suitable for wheelchairs and pushchairs. The Greenwalk is about 10 miles long and takes 5-6 hours to walk. It links areas of public, open space along the Dollis valley in a green chain, to provide a pleasant and quiet long distance walk between the Green belt and Hampstead Heath. The	This detailed response has unfortunately not highlighted the wording that caused such concern. There are four references to the Dollis Valley Green Walk (DVGW) in the Local Plan. The Local Plan nor the Long Term Transport Strategy has renamed the Walk as the Loop.  The Plan does not cover issues such as management and maintenance of such routes.  The London Loop is an idea of connecting a series of parks and open spaces that would form a loop around the borough, the DVGW would be part of this much like how the DVGW is made up of a number of parks and open spaces the loop would be made up of a	No

Walk was developed and implemented by the London Borough of Barnet in 1992 with help from Countryside Management service and grant aid from the Countryside Commission. It now forms part of the London Walking Forum's London Wide Network of walks and links the London Loop with the Capital Ring. It was established as a Walk and not as a cycle route. They were prohibited from use (with the aid of signposts) and still are in Windsor Open Space. The Proposed Plan- To remove the word 'Walk' from the Name and call it 'The Loop'. This bears no reference to its geographical origins or its original intended use as a walk. The walk already shares its route with the 'London Loop'. What benefit is there to rename- The DVGW other than to deliberately lose its function as a walk. The Ministry of Housing, Committees & Local Government have responsibility for the bye-laws covering pleasure grounds and open spaces and good rule and government. These relate in the main to the peaceful enjoyment of Parks and Open Spaces and the suppression of nuisances. This could be interpreted as cycling. The regulations do not give Councils powers to revoke bye-laws under an entirely local process. The regulations do not give local authorities the power to create new categories of bye- Laws. According to the local bye-laws cycling on a footpath constitutes 'Trespass'. In 2009 Barnet Officers ignored the uninterrupted rule of twenty years as a footpath and the existing bye-laws to create 'joint usage' paths along parts of the Dollis Valley Green Walk. It is the intention of the Draft Plan to continue to erode the status of the existing footpaths and extend the Walk/ Loop covering 17 miles without revoking the bye-laws. The London Borough of Barnet is failing to uphold the law with the implementation of these 'joint usage' paths. In 2009 The Mayor Boris Johnson brought in a policy to 'Help a London Park'. He offered £400,000 to the successful candidates. Only 10 parks would be selected on the basis of local votes secured by members of the public. We the Friends of Windsor Open Space canvassed and canvassed to secure enough votes to attempt to win. This was in order to repair the eroding footpaths in Windsor Open Space. To our surprise we actually won. We were selected to receive the money but we did not see a penny of it! Barnet Greenspaces Dept. was allocated the money and they 'double crossed' the local residents who had worked so hard to secure improvements to their footpaths. Barnet Officers with local Councillor Brian Coleman went to TFL and secured more grant money to add to the £400,000 to improve the footpaths by converting them into 'joint usage' paths. TfL gave more funding to Barnet on the proviso that the money was to create 'joint usage' paths instead of for repairing the existing footpaths. TfL are still supporting Barnet with funding to extend the 'Joint Usage' routes as set out in the new Development Plan. Barnet used the money for the entire length of the Dollis Valley Green Walk including building a 'joint usage' path for cycling. This was not what we the Friends had worked so hard for. Barnet Officers excluded us from the consultations as they had other plans and knew that we would be upset to learn that their intentions towards the repairs had changed dramatically! The paths are in an even worse state today! In 2009 Barnet repaired a small section of footpath at the two entrances/exits to Windsor Open Space. That was our reward. The Dollis Valley Green Walk This is a site of Borough Importance for nature conservation. Barnet failed to consult the public in 2009 when they changed the usage of the original footpaths to 'Joint Usage' along the route. Before 2009 there were no cycle routes throughout the Dollis Valley Green Walk. Cycle routes create noise and light pollution. They disturb wildlife and those pedestrians actually walking peacefully on the path. Cyclists do not belong on footpaths. They frighten the existing pedestrians. Barnet's new Draft Plan 2020 takes no consideration of the environment with these proposals. The Draft plan has no policy for policing or monitoring these routes. With the permitted use of e.bikes and scooters on the 'joint usage' paths it will simply be dangerous. This is a recipe for disaster. Who will protect the pedestrians from the cyclists? Barnet won't! These 'joint usage' paths will deter ordinary people with prams, wheelchairs, the disabled the elderly, the very young from taking a walk. They will become 'rat runs' for cyclists. Barnet built cycle routes on the roads. Where have they gone? What proposals are there to increase cycle routes throughout the roads in Barnet? Why are they being proposed throughout 'the Loop'? I surmise that the

number of parks and walks e.g. the Loop also proposes to connect into the Silkstream Valley which is connected through Silkstream Park, Montrose Playing Fields, Rushgrove and down into the Welsh Harp.

Barnet has specific bye-laws for no cycling and specific pathways and parks/open spaces are listed and designated where cycling is prohibited one such location is Windsor Open Space which is why any cyclists use the DVGW shared pathways and directed to on road routes as opposed to through the open space.

Any plans for the delivery of and previous delivery of shared use pathways has been and would be delivered in line with current guidelines, which would cover pathway widths, signage and calming measures.

		<p>London Borough Barnet with TFL thinks it is safer and cheaper for cyclists to cycle through wildlife corridors. They are indifferent to the rights of pedestrians and Global Warming/ Climate Change. Where are Pedestrian rights being upheld? Walking is the healthiest form of exercise and the least harmful to the environment. Has the council given any thought or regard to 'The Public Equality Sector Duty'? How will these 'joint usage' paths affect the public who are protected under the Equality Act? There are still key issues with the Dollis Brook itself not fully addressed in the Draft Plan.</p> <p>Footpath/Cycle path conflict with the river (Brooke farm &amp; Riverside Park) The eroding river banks, the eroding foot paths, to deal with encroachment along the river banks. The Borough has a duty of care to comply with this under the Natural Environment Research Council Act and Water Framework Directive. Under the biodiversity duty, which is part of the Natural Environment and Rural Communities act, public authorities must show regard for conserving biodiversity in all their actions. The new Draft Plan falls well short of the Act by wishing to increase cycling throughout the 17 miles of wildlife corridor, which has Metropolitan Open Land status, part of the London Loop and is a site of Importance for nature Conservation. This would be severely compromised if 'joint usage paths' were to be approved for virtually 17 miles of the walk. There is no regard for the natural world or preservation apart from proposed wetlands. The remainder of the Walk/Loop will be diminished and gone forever. I live adjacent to The Windsor Open Space. There is no cycle path through it yet cyclists and motor cyclists ride through it with impunity. There are no officers to police the routes. No officers will be appointed to monitor the new route. Who will stop e. bikes when they use the cycle paths? The problem will manifest 'Tenfold' if this scheme is actually adopted: Where conflict between cyclists and pedestrians occurs, it is almost always due to cyclists being forced to use infrastructure which is not designed for them all. Please think about those of us who actually like to walk in peace and look at the wildlife and listen to the birdsong without having to worry about cyclists whizzing past on their bikes or having to get out of their way. It is well documented that walking amongst nature or 'forest bathing' is a wonderful way to de-stress and improve mental health. What Barnet is proposing with this new Draft Plan is detrimental to 'Well Being,' walkers and the environment. This cannot be right.</p>		
Natural England	Para 10.5.18	We note that the SSSI is mentioned under the name Welsh Harp SSSI. While we acknowledge this local name for the SSSI, please ensure that the official name, Brent Reservoir SSSI, is listed in the Local Plan in order for local residents to know which name to search for when looking up information on the SSSI.add Sites of Special Scientific Interest to Policy ECC06 – Biodiversity point a) alongside "protecting existing Sites of Importance for Nature Conservation".	Agree	Yes
Sport England	Para 10.5.9	Sport England objects to the standards approach advocated in para 10.5.9 when referring to the Open Space, Sports and Recreational Facilities Needs Assessment. The emerging Playing Pitch Strategy Refresh should set out what provision is required and where.	The Playing Pitch Strategy Update is nearing completion	No
Finchley Society	Para 10.6.2	Add a further paragraph: 'New developments should, without exception, employ green roof technology to provide new habitat and increase the possibility for biodiversity.'	Agreed. Reference added to CDH05	Yes
Finchley Society	Para 10.6.5	Priority should also be given to enhancing the Dollis Brook which is widely visited.	Agreed	Yes
Historic England	Policy ECC01	Historic England support measures to improve energy efficiency and climatic environmental conditions. We recommend that this policy makes reference to historic buildings which may require a different approach to adaptation. Standardised adaption measures can adversely affect historic fabric, the character and appearance of historic areas, and can reduce the environmental performance of historic buildings. However, at present the policy does not recognise the risks posed to the historic environment, and make no distinction between historic buildings and modern development.	Agreed – see revised text.	Yes
Historic England	Policy ECC01	The plan could recognise that the beneficial re-use of existing buildings is a sustainable approach in its own right.	Amend (see technical guidance) see above	Yes



Barnet Cycling Campaign	Policy ECC01	The planned boom in construction, to increase the population by 15.3%, will increase construction traffic and the associated roadworks will also cause congestion. The increased population living in these developments require extra services and online shopping deliveries, even if they don't own a car themselves. Some of the proposed sites involve building on green spaces (e.g. Danegrove, High Barnet station, Colindeep Lane, Finchley Central, Whalebones Park, Mill Hill East, Watchtower House & Kingdom Hall, Watford Way & Bunns Lane, Woodside Park Station West, Barnet Mortuary). The plan needs to show how losses of green space from these and other sites will be replaced. Dockless bikes, car share bays and electric vehicles are all needed for a low carbon future. Policy needs to be strengthened to show how the Local Plan helps to meet the target of net zero carbon dioxide, rather than simply minimising the effect of development on climate change. Policies and plans need to explain how Barnet and its partners will support carbon reduction by: making existing homes energy efficient; ensuring that Barnet has electric buses; creating new green spaces; speeding up the installation of solar panels; and supporting a dense network of zero-carbon shared mobility by 2024. Funding may be available from central government and The Mayor's Green New Deal for London. ULEZ for Barnet: Over 20% of all carbon emissions in London come from road transport. A target date is needed for the ULEZ to cover the entire borough. Enable cycling: To achieve a major shift to cycling, suitable for a zero-carbon Barnet, adopt strengthened policies for TRC01 – Sustainable and Active Travel.	These concerns are reflected throughout the development plan for Barnet which consists of the Local Plan and London Plan	No
Former MHNF	Policy ECC01	The Council will seek to minimise Barnet's contribution to climate change and ensure that through the efficient use of natural resources the borough develops in a way which respects environmental limits and improves quality of life. The Council could go further and the NPPF states (Para 170) "Development should, wherever possible, help to improve local environmental conditions such as air and water quality"	Improvements to air quality from development proposals is stated in Policy ECC02.	No
Finchley Society	Policy ECC01	ECC01h Add at end: householders undertaking refurbishment should demonstrate a significant improvement in energy performance ECC01a It is not clear how the concentration of growth in the Growth Areas will make it easier to manage impacts on climate. Centralising growth could increase car journeys (as people commute to centralised office locations), and may result in carbon-intensive construction of new or replacement buildings. The way in which the Council's preferred strategy addresses the climate emergency should be pointed out. ECC01 Mention the importance of preserving green cover in Barnet, particularly trees, to ensure that vegetation carbon stores are not depleted by development. Ideally every development should be required to increase the number of trees in Barnet, whether on site or in designated alternative locations.	Monitoring such improvements would be an onerous requirement for the Local Plan. It is the householders responsibility that energy performance is improved. In order to better manage the impacts of development on the climate growth is focused in specific locations.	Yes
Mayor of London	Policy ECC01	The Mayor welcomes Barnet's aim to minimise its contribution to climate change and improve air quality as set out in draft Local Plan Policies ECC01 and ECC02. He welcomes the reference to Intend to Publish London Plan Policies SI2 and SI3. The Mayor has produced numerous studies to support his zero-carbon target that are applicable to Barnet.	We welcome the support	No
Thames Water Utilities	Policy ECC02	Recommended that it would be clearer if the policy was separated for water and waste water infrastructure and should include: "The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development".	Agreed. Text revised.	Yes
East Finchley Community Trust	Policy ECC02	More detail on measures which could improve air quality - particular concerned that the lack of bus services leads to increased car usage.	Agreed. Text revised.	Yes

Elizabeth Silver	Policy ECC02	Add: to k) High carbon-emitters such as traditional energy generation, or any polluting form of energy generation should not be permitted in residential or Green Belt/Metropolitan Open Land locations.	Green Belt and MOL have some of the highest levels of policy protection from inappropriate uses	No
Sport England	Policy ECC02	Consider that the draft Plan should also make clear that the Agent of Change principle should extend further to recognise lighting and the risk of ball strike.	The Agent of Change principle is guided by the London Plan with regard to noise and other nuisance generating uses	No
Friends of Finchley Way Open Space	Policy ECC02	I support this policy. The draft plan acknowledges the numerous streams in the borough, many of which are underground. It is vital that the water table is considered in detail when giving planning permission for new developments, including for basements. We support the plan to open up rivers and to provide walking routes along rivers, while maintaining decent sized flood plains and rejecting building development in these areas.	This support is welcomed	No
Barratt London	Policy ECC02	Policy should include flexibility that this policy will apply where it does not prejudice other policies of the Regulation 18 Local Plan.	Where relevant to assessing an application, all policies in the plan need to be considered and tensions between different policies reconciled in reaching a balanced judgement	No
Environment Agency	Policy ECC02d	In general we support part (d) of the policy which requires an investigation to establish the level of contamination for proposals on land which may be contaminated. We suggest 'remediation' is specifically mentioned either in addition to, or instead of 'mitigation' as the clean-up (remediation) of contaminated land is required where identified.	Agreed	Yes
Environment Agency	Policy ECC02g	Part (g) should be reviewed in light of NPPF para 149 'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, etc.' We agree development should demonstrate it will not cause harm or deterioration to the water environment, however, it should also consider how it can improve the water environment for the lifetime of development. Discussions with Thames Water and the Lead Local Flood Authority should also inform this policy. For example, proposals should ensure there is sufficient surface water and foul drainage treatment capacity to serve developments, facilitate the separation of surface and foul water systems. The provision and adoption of Sustainable Drainage Systems are essential to improve water quality as well as attenuating and slowing down run-off can alleviate pressure on the drainage network. The policy should require that where there are capacity issues in the drainage network that developers will demonstrate that the necessary upgrades will be provided in time for the development (or development will be refused). We recommend you refer to Policy DM 18 'On Site Management and Reuse of Waste Water and Water Supply' in Epping Forest's Local Plan submission version for an example of how water quality requirements have been included in policy. Policy DMEI 10 Water Management, Efficiency and Quality in Hillingdon's Local Plan Part 2 (adopted January 2020) is also another good example of how this aspect has been addressed.	Agreed – new policy ECC02A	Yes
Environment Agency	Policy ECC02g	Policy on flood risk seems very general and doesn't add much value to what is already set out in the NPPF. It is not tailored to local circumstances for Barnet, or in the spirit of NPPF para 149. 'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk...' We would be unable to support the policy section on flood risk in its current form. We would strongly recommend there is a separate flood risk or water management policy rather than this being combined into a general 'environmental considerations' policy. Given the level of growth required the policy leaves us with many questions, such as; <ul style="list-style-type: none"> <li>• What is Barnet's approach on the provision and contribution to flood defences and flood alleviation scheme's to protect the borough's communities, e.g. the Silk Stream flood alleviation scheme?</li> <li>• How will Barnet's developments ensure communities are protected and resilient to the impacts from climate change on flood risk? There is currently no mention of climate change in relation to flood risk.</li> </ul>	Agreed – new policy ECC02A	Yes

		<ul style="list-style-type: none"> <li>• How will windfall applications be treated that are proposed in areas at risk of flooding? Are there enough areas in the Borough in Flood Zone 1 (low risk) to comfortably accommodate windfall sites, without resorting to areas of Flood Zone 2/3 (medium and high risk) including climate change?</li> <li>• What is Barnet's approach to making space for water and ensure there is adequate space and flood storage areas for flood waters to go, for all sources of flood risk? What protections will flood storage areas/functional floodplain have in the Local Plan?</li> <li>• What is the approach for proposed development in areas of functional floodplain which are identified by the local authority in the SFRA? We recommend these are protected for flood storage within the Local Plan, rather than developed on (see our comments in relation to Watling car park and market).</li> <li>• How will Barnet work in partnership with other borough's that share the same river catchments to alleviate flood risk from river and surface water flooding?</li> <li>• How has this policy been informed by the West London SFRA policy recommendations?</li> <li>• How has this policy been informed by Barnet's Surface Water Management Plan (2011) and Flood Risk Management Strategy (2017). Should stronger requirements apply to Critical Drainage Areas as identified in the Surface Water Management Plan, e.g. can developments help deliver the retrofit of SuDS measures to alleviate current flood risk?</li> </ul> <p>We think the policy needs to address these issues informed by the SFRA. The policy should require developments to contribute towards a positive reduction in flood risk, on and off site, wherever possible. The policy should also promote early discussions around flood risk to ensure that opportunities through the development are being maximised. The maintenance, replacement and repairing of flood defences should be delivered as part of developments wherever possible, particularly where developments are expected to directly benefit from such defences. We recommend you look at other draft Local Plan policies in London for best practice. For example, Barking and Dagenham's draft Local Plan Policy DM28 'Managing Flood Risk, Including Surface Water Management' includes requirements for flood defences and seeking opportunities to relocate existing development vulnerable to future flood risk due to climate change to more sustainable locations.</p>		
Environment Agency	Policy ECC02h	<p>We support (part h) where it refers to Table 20 and the requirement for new dwellings to be designed to ensure that a maximum of 105 litres of water is consumed per person per day. We would prefer if the policy itself stated the requirement rather than refer to Table 20. We would suggest developers submit a water efficiency calculator report, or equivalent information, at the planning stage to demonstrate compliance with this standard. Non-residential developments can also consume significant amounts of water. We recommend a policy requirement for commercial development is also included that new commercial buildings are required to achieve a BREEAM 'excellent' rating for water efficiency (or an equivalent rating with any successors). This is in line with Policy SI 5 Water Infrastructure of the London Plan (Intend to Publish version, 2019). Older buildings are often the least efficient in resource use. We recommend the policy supports retrofitting of existing buildings where opportunities arise through refurbishments and changes of use. There are a number of BREEAM Technical Standards documents to support retrofitting for commercial and residential buildings.</p>	Agreed. However we consider that making cross-reference to Tables is a more effective way of getting the message of policy across.	Yes
Environment Agency	Policy ECC02i	<p>We welcome part (i) though think the policy should be stronger to emphasise a firm expectation to naturalise rivers (including de-culverting) and incorporate buffer zones as part of developments. We are concerned that words such as 'wherever possible' and 'where appropriate' downplay the expectation and aim especially if these caveats are not fully explained in the supporting text. It would also be stronger by explicitly stating the buffer zone standard expected of developments adjacent to main rivers (as specified in paragraph 10.3.16 where it recommends &gt;10 metres width of buffer zone), as this endorses it as a policy standard. We also recommend the policy states that buffer zones should include creation of wetland habitat and native planting and have a management plan to ensure long term biodiversity gains. Public accessibility is important but so is the need to create good</p>	Agreed – policy and supporting text revised.	Yes

		quality, well-connected habitat within the buffer for the benefit of wildlife. Although we support the last sentence that contributions towards river restoration and de-culverting will be expected the caveat 'where appropriate' should be expanded on in the supporting text. We would expect contributions for proposals that are unable to restore rivers or de-culvert due to significant physical constraints that can't be overcome such as safety risks or an increase in flood risk and these would need to be fully justified.		
Mayor of London	Policy ECC03	The Mayor welcomes the proposed Local Plan policies on sustainable waste management. The Local Plan should set out on a map which sites and areas in Barnet are to be safeguarded for waste as identified in the North London Waste Plan. In this regard, the safeguarding of all existing waste sites in Barnet is welcome as is the allocation of Scratchwood Quarry for continued and more intensive waste use.	Agreed. New map of safeguarded waste sites reflecting the (soon to be adopted) NLWP	Yes
Finchley Society	Policy ECC03	The Council should have a policy of strong enforcement of the laws against fly-tipping. Such crime can only be discouraged by active monitoring and prosecutions..	Flytipping is outside the remit of Local Plans. The Council's Environmental Health Service is responsible for dealing with incidents of flytipping.	No
LBB Haringey	Policy ECC03	Supports this policy and will continue to work with Barnet and other councils involved.	We welcome this support. This will be reflected in our Statement of Common Ground	No
Pinkham Way Alliance	Policy ECC03 & Section 10.4	Whilst honestly worded, fails to reflect the fact that the NLWP is outdated	NLWP is not outdated having been subject to Examination in late 2019. The Council awaits publication of the Inspector's Report.	No
Department of Education	Policy ECC04	e). In areas that have been assessed by the Barnet Parks and Open Spaces Strategy or a site specific assessment as being of low quality and low value the Council will consider limited development on open spaces. The Council will require any proposal that involves the loss of <del>low quality and low value</del> open space to robustly demonstrate that the following criteria can be satisfied: i. the development proposal is a small scale ancillary use which supports the improved use of the open space; <del>and</del> or ii. that opportunities to improve the quality and value of the existing space have been explored and subject to viability assessment; cannot be delivered to enhance the quality and value of the existing space; or iii. Equivalent or better quality open space provision can be delivered or iv. <u>The benefits of the new development outweigh the disbenefits of the loss of open space.</u>	ECC04 specifically relates to areas of open space across the borough that were considered as part of the BPOSS and where a judgement reached at the time that the study was undertaken that an area was of low quality and low value. BPOSS forms part of the Local Plan Evidence Base and therefore will help in planning decision making as will other material considerations such as any re-assessment of a BPOSS site.	No
Department of Education	Policy ECC04	Policy requires that new development that generates demand for new open spaces, new open space or payment in lieu will be required. This policy element - at parts b). i. and ii. - should not be required for the provision of community and social infrastructure as it could place additional burden on the provision of new school places both financially and in design terms.	Part b) of the policy refers to the requirement from all developments that create additional demand for open space where opportunities arise.	No
Elizabeth Silver	Policy ECC04	- a (i) add: Accessibility should not include developments that involve losing green space e.g. pay-for leisure activities. b(i) There is a risk that developments that create an additional demand for open space may claim exemption on cash-payments for off-site provision, or the off-site provision may be too far away to be useful, given that many spaces (eg sites 17,19,45) have been built on. What is the mechanism for enforcement of these measures? Relief on the Community Infrastructure Levy can be claimed where "the charging authority must consider that paying the full levy would have an unacceptable impact on the development's viability" <a href="https://www.gov.uk/guidance/community-infrastructure-levy#para076">https://www.gov.uk/guidance/community-infrastructure-levy#para076</a> b (iii) Folly Brook & Darlands Lake Nature Reserve are sites of Borough Importance (SBI) Grade I Burtonhole Lane & Pasture, SBI – Grade II and SINC's. e) Green spaces are sometimes left neglected/un-maintained and thus become low quality and low-value. That should not be a route to losing the green space. A better rule is to improve the quality of the space, in all cases. Maintenance of green spaces must include removal of litter & fly-tipping. eg in Copthall Railway Walk , Copthall Old Common, Mill Hill Old Railway Nature Reserves – all are full of litter originating from Allianz Park stadium and sports grounds.	The Council aims to provide a range of parks, open spaces and leisure facilities across the borough to suit the needs of all users. ECC04 seeks to optimise the benefits of open space and create more accessible green spaces through a range of measures.	No

Barnet Cycling Campaign	Policy ECC04	Policy lacks commitment to make parks and open spaces accessible by cycle or for cycling within them. Cycle routes to parks and between parks need to be provided and routes through parks and open spaces need upgrading with wider, hard surfaces that separate walkers from cyclists.	The Council is committed to improving cycle routes to and between parks. To reflect this expand reference to securing better access arrangements in part b of the policy.	Yes
Ramblers Association	Policy ECC04	Support Green Infrastructure Plan but to include emphasis on improving access to new Regional Park and Rights of Way Network. Part a)i should include improved rights of way access for walkers	The establishment of a Regional Park is at a very early stage. However it remains an ambition of the Council within the lifetime of the Local Plan.	No
New Barnet Community Association	Policy ECC04	Appears to be no challenge on the use of agricultural land, which could support the need for allotments. Need for clear assessment on what the Regional Park is aiming to achieve, including public access.	The establishment of a Regional Park is at a very early stage. However it remains an ambition of the Council within the lifetime of the Local Plan.	No
Sport England	Policy ECC04	As there is no reference to playing fields should be noted NPPF, para 97, does specifically seek to protect playing fields (not just pitches). Policy ECC04 E does allow losses when not viable but not being viable is not the same as strategically being identified as surplus. This should be amended.	The Open Space Strategy has provided an assessment of quality and value and on the basis that it is rated poor, there is an expectation that equivalent or better space will be delivered.	No
Department of Education	Policy ECC04	The policy does not allow for the loss of open space unless it has been previously assessed by the Barnet Parks and Open Spaces Strategy as being of low quality and low value. This is not considered to wholly accord with the draft London Plan and the NPPF.	The policy does not expressly state that loss of other open space will not be allowed if a compelling case for its loss can be made.	No
Friends of Finchley Way Open Space	Policy ECC04	Barnet is an outer London borough where the attractiveness of the borough is the quality of life reflected in both the access to central London for jobs, leisure and shopping and the easy access to formal and informal green spaces. The combination is what makes the borough such a major attraction for families. It is essential that Barnet commits funding and more personnel to support the maintenance of green spaces of all sizes. The physical and mental health benefits of walking and informal play should not be underestimated.	The public health benefits of such activities have been amply demonstrated through the COVID 19 lockdown	No
Pinkham Way Alliance	Policy ECC04	Welcomed positive tone of Council's Green Infrastructure SPD. Policy ECC04 c)i. should include Pinkham Way (as also included in GGA1 map.	A specific reference to Pinkham Way is not merited	No
Barnet Society	Policy ECC04 & Paras 10.5.10-12	The BPOSS assessment of open space quality and value produced some bizarre conclusions. Within the Chipping Barnet area alone, for example, spaces deemed 'low quality, low value' included Monken Hadley Common & Wood, Ravenscroft Gardens, Rowley Green Nature Reserve, King George V Playing Fields and Highlands Gardens (to name just some). Such a ranking would astonish the many who use and love them.	BPOSS forms part of the Local Plan Evidence Base and therefore will help in planning decision making as will other material considerations such as any re-assessment of a BPOSS site.  The Council is intending to review the BPOSS and this review will feed into a future planning policy framework for Barnet.	No
Environment Agency	Policy ECC04b	We support part b (iii) where it references watercourses in terms of maintaining and improving the greening of the environment, and enabling green corridors. Many of the improvement actions identified for rivers in Barnet are within the parks and open spaces.	We welcome this support	No
Mayor of London	Policy ECC05	The Mayor welcomes the inclusion of the green grid approach to green infrastructure in the draft Local Plan and its aim to provide additional open space and enhance existing green and open space as well as biodiversity across the borough. Draft Local Plan Policy ECC05b on Metropolitan Open Land (MOL) should simply refer to the equivalent Intend to Publish London Plan Policy G3 or it needs to more closely align to the London Plan policy. In particular, Barnet's proposed policy on MOL policy should afford it the same status and protection as Green Belt. In this regard the Mayor strongly objects to the alterations to the MOL boundaries that release open green space from MOL protection as these areas to be released are still distinguishable from the built-up area and forms part of the open land, satisfying the MOL designation.	Agreed	Yes

Taylor Wimpey North Thames	Policy ECC05	To overcome this objection, Policy ECC05 should be revised to clarify that the provisions of Green Belt policy as referred to at criteria a)j will be applied equally to MOL and to set out consistent criteria against which proposals will be assessed.	Status of MOL has been clarified in Policy ECC05	Yes
Elizabeth Silver	Policy ECC05	Reword: <i>"The council's evidence (Barnet Green Belt and MOL Study 2019) does not support making the case needed to demonstrate that exceptional circumstances exist sufficiently to justify making revisions to the existing Green Belt/MOL boundaries."</i> To: "The council does not support revisions to existing boundaries of Green Belt and MOL by claiming exceptional circumstances." (Barnet Green Belt and MOL Study 2019)	ECC05 sets out criteria that must be considered for any development proposals that come forward on or adjacent to Green Belt / MOL.	No
Mayor of London	Policy ECC05	Should simply refer to Intend to Publish Policy G3, or more closely align. The Mayor strongly objects to the alterations to the MOL boundaries that release open green space from MOL protection as these areas to be released are still distinguishable from the built-up area and forms part of the open land, satisfying the MOL designation.	The Council considers it sensible to alter Green Belt and MOL boundaries in order to support the robustness of their designations and their practical application. The Green Belt Study highlighted at Map 25 that there is no practical benefit in the MOL boundary cutting through a building. At Map 26 the Study recommended this revision to align with the footpath while at Maps 36 and 37 it recommended a more rational and therefore stronger boundary for both areas.	No
Barnet Society	Policy ECC05	Under a) i add a reference to the Government's advice on the role of the Green Belt in the planning system published 22 July 2019.	Repeating and cross-referencing Government advice makes plan unnecessarily lengthy and easily become dated as policy advice and guidance evolves and changes over time.	No
Finchley Society	Policy ECC05	ECC05b 'inappropriate' should be defined or examples given to reduce argument, especially in appeals	The Government's definition of inappropriate development is set out within the NPPF.	No
Natural England	Policy ECC06	recommend strengthening wording to better reflect the concept of biodiversity net gain as an aim for all development. Wording could also reflect usage of the Biodiversity Metric 2.0.	Agree – text revised	Yes
Former MHNF	Policy ECC06	It should be strengthened to ensure that all development must contribute to a net gain in biodiversity – as per NPPF	Agree – text revised	Yes
Environment Agency	Policy ECC06	We would like ECC06 to require consistent management and control of non-native invasive species which will assist in the protection and enhancement of biodiversity through a long term management plan. Invasive species have been identified across Barnet as a contributing factor as to why the rivers are not able to achieve good ecological status or potential (see comments on Chapter 2).	Agreed. The need to manage invasive species is acknowledged in paras 10.12.5 and 10.24.8.	Yes
Finchley Society	Policy ECC06	Add 'h) all new flat rooftops should be provided as green roofs designed to support and enhance biodiversity.'	Specific reference to Green Roofs at CDH05	Yes
Pinkham Way Alliance	Policy ECC06	Approach to biodiversity is inadequate and fails to take latest guidance into account. ECC06 should include reference to Government's 25 year Environment Plan, IPBES, and RTPI's Rising to the Climate Crisis which contains important site selection criteria.	This section has been revised	yes
Environment Agency	Policy ECC06a	Part (a) of the policy should also include 'existing priority habitats and species according to the NERC 2006.' In addition to the London Wildlife Trust we recommend the Brent Catchment Partnership is included in part (a) as a key partner.	Agreed	yes
Environment Agency	Policy ECC06d	We recommend part (d) of this policy includes the requirement to achieve a biodiversity net gain rather than making 'the fullest contribution	Agreed.	Yes
Environment Agency	Policy ECC06f	We welcome part (f) but recommend floodplain habitat is also included, to read as follows: f) supporting opportunities that facilitate river and floodplain habitat restoration in particular for the River Brent, Silk Stream and Pymmes Brook (See Policy ECC02).	Agreed	Yes

		We consider the words 'if appropriate' are not needed in part (f), as suitable caveats are already expressed sufficiently within ECC02.		
Pinkham Way Alliance	Map 7	Error in Public Open Space Deficiency for Pinkham Way site (as had also been made in GI SPD) breaching Reg 9(1) of the Environmental Assessment of Plans or Programmes Regs 2004.	Further clarification on what this error is will be welcomed	Yes
Mayor of London	Table 16	Table 16 should be consistent with draft Local Plan policy TRC03, which states that electric points will be delivered in accordance with draft London Plan Standards – that is 20% active charging facilities with passive provision for all the remaining spaces.	Agreed. Table 16 revised	Yes
Finchley Society	Table 16	In Table 16 (third box down) the proportion of car parking spaces with provision for an electrical charging point (present or future) should be at least 3 in 5. The Government has committed the UK to cease sales of internal combustion vehicles by 2035. This Plan runs until then, and drivers will expect to be able to charge vehicles in most parking places. Encouragement of a switch to electric vehicles should be a part of the Council's climate change strategy.	Table 16 revised to be consistent with London Plan standards	Yes
Environment Agency	Table 19	<b>1st row</b> Proposed development will need to demonstrate application of the sequential test and exception test where inappropriate development is proposed in areas of flood risk. Development scale: Minor, Major and large scale Proposed development will need to demonstrate application of the sequential test and exception test where inappropriate development is proposed in areas of flood risk . Development scale: Minor, Major and large scale. NPPF para 164 states that applications for some minor development and changes of use should not be subject to the sequential or exceptions tests but still meet the requirements for site-specific flood risk assessments. <b>- 2nd row</b> Proposed development will need to provide a Flood Risk Assessment on the known flood risk potential from all sources of flooding including surface water <sup>48</sup> to the planning application site, the risk to others, how it will be managed and taking cli-mate change into account. Development scale: All development over 1 hectare in Flood Zone 1 Development in Flood Zone 2 & 3 except for minor development. Even minor developments require some form of flood risk assessment proportionate to the minor scale and nature of the proposals. Even if the minor development doesn't meet the threshold to be reviewed by either the Environment Agency or the Lead Local Flood Authority, the guidance on <a href="https://www.gov.uk/guidance/flood-risk-assessment-standing-advice">https://www.gov.uk/guidance/flood-risk-assessment-standing-advice</a> should be followed by both the applicant and local authority if the development is located within Flood Zone 2 or 3.	Agreed	Yes
Finchley Society	Table 19	2nd box. Where planning permission is required for hardsurfacing porous materials must [not 'should normally] be used. Hardsurfacing porous materials should be used whether planning permission is required or not. Admittedly, in the absence of a requirement for planning permission the Council cannot enforce this, but the text gives the impression that it does not matter.	Agreed	Yes
Thames Water Utilities	Table 19	Supportive of the inclusion of this table; however, would request that it should apply to minor, major and large scale (not just large schemes). Also suggest inclusion of the following text: <i>Thames Water encourages developers to use their free pre-planning service (<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>	Table 19 revised.	Yes
Thames Water Utilities	Table 20	Supports this requirement for all new dwellings.	We welcome the support.	No
West Finchley Residents Association	Chapter 11	Limitations of public transport should be noted (growth assumes public transport support) and bus network should be improved, to improve access and congestion on roads.	As evidenced by the Long Term Transport Strategy the Council is working with TfL on improving the local bus network, recognising the impact of congestion on bus services.	No

Brent Cross South Partnership	Chapter 11	Orbital bus speeds are identified as a limiting factor in moving people around the borough although there do not appear to be proposals to alleviate this. Further clarity is required on how this strategic issue may be mitigated. We support the priority given to encouraging forms of active and sustainable travel.	The improvement of orbital travel for Barnet is a focus of the Barnet Long Term Transport Strategy (LTTS). The document provides detail on the options for orbital travel including improving the speed of the bus network through bus prioritisation initiatives and rapid transit buses; and improvements to the cycle network.	No
Brent Cross South Partnership	Chapter 11	One of the key transport issues facing transport systems and new development is that of servicing and freight activity. TfL's Freight & Servicing Action Plan (March 2019) identifies that around one fifth of road traffic in London comprises lorries and vans, with HGVs involved in 63% of fatal cyclist collisions and 25% of fatal pedestrian collisions, despite only making up 4% of overall miles driven in the capital. It is considered that this is an important element not given suitable attention within the Draft Local Plan, with a range of measures possible for inclusion to promote more sustainable delivery options, particularly given the increasing role of online shopping for residents and businesses. Clarity is needed on the approach for freight and servicing on the highway network within the Borough.	This issue is more appropriately considered as part of a Boroughwide Transport Strategy. The Local Plan supports Freight Quality Partnerships and the Council would welcome working with partners to deliver sustainable freight and servicing for the Borough.	No
Verena Donig	Chapter 11	Need for wider bus links, particularly east/west links across the Borough. Further parking restrictions or priority for buses could be implemented to help speed of bus travel/ease stoppages.	The improvement of orbital travel for Barnet is a focus of the LTTS. The document provides detail on the options for orbital travel including improving the speed of the bus network through bus prioritisation initiatives and rapid transit buses; and improvements to the cycle network.	No
Federation of Residents Associations in Barnet (FORAB)	Chapter 11	Transport. This whole area is most troubling. The dependence on the two branches of the Northern Line for travel to work is acknowledged as is the reality that these lines are currently overloaded. Whilst some capacity increase is possible, which will include the necessitate for rebuilding at Camden Town, financial constraints indicate it is likely to be many years before plans come to fruition. Even worse is the prospect that with a change in emphasis by the Govt to HS2 and transport infrastructure in the north, there is considerable doubt whether Crossrail 2 and WLO will ever see the light of day, and certainly they would not arrive before the timescale of much of the planned additional housing. Though orbital services bus links are a legitimate concern we doubt they are anything other than marginal in the overall picture and any improvements will only have limited impact. More important is finding ways to reduce bus travels times, the decline of which is cited as a major reason for the fall in bus usage. So the notion of major improvements to public transport in the Borough is little more than fanciful and the Plan should reflect the impact of this reality rather than dwell on aspiration. And linked to this, it is evident the plan is very weak on curbing car usage where much more imaginative solutions are needed e.g some form of road pricing, particularly vehicles entering the Borough from the motorways to the north. We do however support ideas such as priority for buses, banning parking close to schools and to increase 20mph zones.	Reducing dependency on the car is an important objective for this Local Plan. The Barnet Long Term Transport Strategy sets out several initiatives with the potential to reduce car usage while Local Plan policies encourage more sustainable modes of travel and seek to reduce land allocated to car parking. The Local Plan is not capable of introducing road user charging.	Yes
Former MHNF	Chapter 11	We agree with your general comment that radial links into Central London are good if often extremely overcrowded, and they are still not accessible for all at many stations. We now have Step-Free Access at Mill Hill East and await its delivery at Mill Hill Broadway following the grant of funding from the Department of Transport.	The improvement of orbital travel for Barnet is a focus of the LTTS. The document provides detail on the options for orbital travel including improving the speed of the bus network through bus prioritisation initiatives and rapid transit buses; and improvements to the cycle network.	No
East Finchley Community Trust	Chapter 11	Requests plan includes detailed proposal about enhancing public transport connectivity in the East Finchley ward.	See previous response on Long Term Transport Strategy and improving orbital travel	No
<a href="mailto:Good.neighbours@yahoo.co.uk">Good.neighbours@yahoo.co.uk</a>	Chapter 11	Can you please address transport to our hospitals. I work with elderly and buses to Chase Farm, Finchley Memorial and Barnet from Mill Hill do not exist.	See previous response on Long Term Transport Strategy and improving orbital travel	No



Friends of Finchley Way Open Space	Chapter 11	Support the car parking space per housing unit proposed in the Plan. It is clear from the PTAL scores for most of the borough that there is currently insufficient public transport access to significantly reduce car usage at this time. There is a conflict between Healthy Streets and an aging population in what is a relatively hilly part of London. This needs better thought than the Plan has given it at present. Not everyone who is 'older' is disabled or needs care. Too often there is a clean break made between people who are disabled and people who are able bodied. In reality many older people and those with chronic illnesses fall somewhere in between and the transport system does not seem to cater for this group.	Policy TRC03 is a bespoke parking management policy for Barnet. We consider that it provides travel mode options for new residents.	No
Friends of Finchley Way Open Space	Chapter 11	I support the Plan in trying to navigate a way between a carless society being promoted by the Mayor of London and the realism that Barnet is a large outer borough with limited access to transport in many places. It is a realistic assumption that many, if not most, residents will continue to have cars for some years to come.	The Council welcomes this support	No
Former MHNF	Chapter 11	Orbital journeys across Barnet to other parts of North, East & West London are however most difficult and time consuming in the extreme. We have referred to this in detail earlier. The result is a high number of journeys by private car. This will not change materially in the life-time of this plan. This also affects productivity.	See previous response on Long Term Transport Strategy and improving orbital travel	No
East Finchley Community Trust	Chapter 11	Concerns about the capacity of local infrastructure already showing signs of strain and envisage increased pressure as the population grows. No details given in plan on how the High Barnet branch of the Northern Line will cope with increased population north of East Finchley and the anticipated local growth. Request the plan includes a clear strategy for revitalising East Finchley town centre. Plan claims the borough is well served by public transport including bus routes, however the High Road N2 has only one bus route (North to South) and already very significant queues for the 263 at peak times. Requests more detail about how bus capacity can be enhanced to meet existing and projected need. Lack of public transport to Finchley Memorial hospital - hopper bus facility is required to integrate this important facility into the local environment. Requests plan to include some specific detail about how Finchley Central Hospital could be better connected to its catchment area. Requests details on how the borough proposes to work with Transport for London on developing a new bus service between East Finchley and the Royal Free Hospital that would also better connect local residents to the green space of Hampstead Heath which is an important consideration as our ward is identified as having poor access to green space within the ward boundary.	See previous response to FORAB	No
Brent Cross South Partnership	Chapter 11	We support the recognition that sustainable and active modes of travel are key, but suggest that they should be further promoted. We note also that the draft Transport Strategy is currently out for consultation which will help to inform the development of the Plan moving forward. We are considering the content of the draft Strategy and may make representations on that document in due course.	The Local Plan has been updated to reflect the progress of the Long Term Transport Strategy	yes
Ivor Hall	Chapter 11	Might it be possible to resolve the present problems of traffic movement at the bottom end of Northway. For some reason parking has now been allowed from the bridge to the traffic lights on the Market Place. Hold-ups continue, including for the H2 Bus, I was in one last Saturday. Today, as clear as you like it!!! Oh dear!. A Few years ago my Wife witnessed an accident on the North side of the junction of WW and Temple Fortune Hill (TFH) where a cyclist travelling North ended up on the bonnet of a car travelling South. Starting at the South junction with Hampstead Way (HW) WW continues the same 30mph restriction until it reaches the junction between WW and TFH. I find that visibility is poor from when I drive up TFH wanting to cross to the higher part of TFH and many vehicles at this junction are travelling along WW from the South are moving at 30mph. There are also quite a few Pedestrians wanting to do the same. The 20 mph signs on the North of this junction are not that visible to these motorists and cars seem to be parking too close to the junction on that side. Why not start the 20mph limit at the South end of WW?.	This detailed matter is beyond the remit of the Local Plan and is best addressed directly with the Council's Highways Service who have been informed about this issue.	No

Sport England	Chapter 11	Active travel is the most common form of activity for the population to become, and remain, active so this is supported by Sport England.	We welcome the support.	No
Barnet Society	Section 11	Regret there is no mention of transport innovations such as affordable very rapid transit (AVRT).	The plan should only reference proposals that stand a realistic chance of coming forward during its lifetime.	No
Finchley Society	Section 11.3	The lack of orbital public transport is indeed a major impediment to the success of the strategy in this Plan. But this chapter is far too optimistic about the delivery in the Plan period of either the West London Orbital (a misnomer for a line that would go no further east than Cricklewood or Hendon) or Crossrail2, which would go no further west than New Southgate. More realistic redrafting needed.	Local Plan has been updated to reflect timescales for delivery of these 2 projects	Yes
Finchley Society	Section 11.4	This whole section is too bland. Plan must admit somewhere and discuss how the increase in population envisaged will have serious effects on the burden on all transport networks - rail, bus, road.	This is more of a matter for the Long Term Transport Strategy. References have been updated with regard to the Transport Strategy	Yes
St William Homes LLP	Section 11.6	Parking standards as set out in Chapter 11 will need to reflect those set out in the London Plan; specifically, standards set out in Policy T6 'Car Parking' seem excessive and at this stage, these are unjustified. These will need to be revised as the Plan is taken forward.	Barnet's car parking study and update provides an evidence based review of residential parking standards	No
Ivor Hall	Section 11.6	I was in touch with you hoping that at the time of the recent extension to the CPZ in part of Erskine Hill (EH) could have been extended along Erskine Hill Northwards to at least Asmunds Hill (AH). You were unable to do this. I live in EH between Temple Fortune Hill (TFH) and (AH) which has some 60 properties fronting onto that section. In addition there are two cul-de-sacs with some 22 properties whose overflow of cars park in this section of EH. We further have the H2 Bus which feeds into Golders Green Station before it turns left into AH which is a part of the existing HGS CPZ. We are therefore vulnerable to the parking by commuters who go forward into Central London. Could you consider consulting the residents of these areas to the making of this section of EH a CPZ zone or even the whole of the North (artisan) quarter of HGS.?.	Local Plans are not the mechanism for introducing CPZs. Chapter 11 clarifies how a CPZ can come forward  Controlled parking zone added to the Glossary	Yes
Finchley Society	Section 11.6	There should be some cross-referencing between this section and the Schedule of Site Proposals. Many of the items in that schedule refer to the possible redevelopment of car parks, yet there is no strategy to which these discrete items are related	The Local Plan approach on the redevelopment of underutilised car parks is set out at GSS12	No
Finchley Society	Para 11.1.1	Add 'and acted upon' after 'Specific National and London Plan Policies to be taken into account'	The implication from the wording is that they will be acted upon	No
Barnet Cycling Campaign	Para 11.1.1	Specific National and London Plan Policies to be taken into account <b>ADD</b> - and acted upon. .Please make sure that active travel is always emphasised: Barnet Council will have to make a considerable step change in provision for active travel, cycling & walking where there have been decades of under investment and lack of maintenance. A street can move far more pedestrians, cyclists and bus passengers per hour than it can people in cars. We have to recognise that it is ridiculous to prioritise the least efficient means of moving people and the most damaging form of movement. Parked cars and heavy traffic both have a huge impact on the efficiency and safety of active travel.	There is much greater emphasis on promoting active travel in the Reg 19	Yes
Finchley Society	Para 11.2.1	We endorse the introductory statement and strongly support the investment in orbital links with priority given to active travel. We firmly agree with the statement from the draft London Plan '10.1.4 Rebalancing the transport system towards walking, cycling and public transport, including ensuring high quality interchanges, will require sustained investment including street environments to make walking and cycling safer and more attractive, and providing more, better quality public transport services to ensure that alternatives to the car are accessible, affordable and appealing.' This is the essence of what must be achieved to make a habitable city. Active travel should always be emphasised	The Council welcomes this support	No
Barnet Cycling Campaign	Para 11.2.1	Endorse this introductory statement and strongly support the investment in orbital links with priority given to active travel.	The Council welcomes this support	No
TfL	Para 11.3.2	We note that this paragraph states that 'few stations currently benefit from Step Free Access.' However, of the 13 Northern line stations in Barnet, seven currently offer step-free access. There are currently plans to make improvements at four other stations to provide step free access: Brent Cross, Colindale,	Text has been updated to reflect progress on Step Free Access.	Yes

		Burnt Oak, and Mill Hill East. This represents a higher than average number of stations with step free access compared to other parts of London. A new station will also be delivered at Brent Cross West, which will offer step-free access and improve public transport connectivity in the south west of the borough.		
Finchley Society	Para 11.3.3	This analysis highlights the need for improvements to the bus network, which has to be addressed 2020-2025 as a matter of urgency in order to redress the current situation and safeguard the future of the bus sector.	This section has been updated to reflect the Long Term Transport Strategy	Yes
Barnet Cycling Campaign	Para 11.3.3	Improvements to the bus network need to be addressed 2020-2025 as a matter of urgency in order to redress the current situation and safeguard the future of the bus sector.	This section has been updated to reflect the Long Term Transport Strategy	Yes
Barnet Cycling Campaign	Para 11.3.4	For Barnet to achieve a reduction in dependence on private vehicles orbital travel needs to be radically improved. <b>ADD</b> -by investment in public transport, walking and cycling.	Agree.	Yes
Finchley Society	Para 11.3.4	After 'For Barnet to achieve a reduction in dependence on private vehicles orbital travel needs to be radically improved' add 'by investment in public transport, walking and cycling'.	Agree	Yes
Geoffrey Silver	Para 11.3.5	Having all seats taken in trains leaving the Mill Hill East terminus in the morning rush hour is a symptom of overcrowding, which needs to be addressed by more frequent trains.	Mitigating problems with overcrowding is considered through the IDP, Long Term Transport Strategy and Strategic Transport Assessment	No
Former MHNF	Para 11.3.5	We do not believe that splitting the Northern Line at Camden Town, so that Barnet branch trains go only via Bank, and Edgware branch trains go only via Charing X is desirable. This would be a great inconvenience for Barnet residents who need the alternate routing as it is currently provided.	This is a matter for Transport for London	No
TfL	Para 11.3.5	We note the Council's point about crowding and capacity on the Northern line and welcome further discussion on the issue in parallel with their long-term transport strategy. We would also welcome these discussions covering station capacity as well, as development near stations in London can often present crowding challenges. Crowding can also occur at gatelines, within the station building, on platforms, and/or on trains. We expect new developments that are near/impact on stations to contribute towards station improvements where identified, and urge the Council to support these improvements to ensure that applicants contribute fairly and appropriately.	We welcome the opportunity to have further engagement on crowding and capacity of the Northern Line in parallel with the Long Term Transport Strategy	No
TfL	Para 11.3.6	We support the Council's ambition to create new or extended bus services, both delivered through new development and as part of our continuous review of the bus network to respond to changing circumstances, including growth. We also urge the Council to ensure every opportunity to work with developers to deliver improvements in the form of provision of bus priority is taken. It is also important to consider other elements of the bus service (such as adequate provision of bus stations, bus garages, bus stands, and driver facilities) and while these are not sufficient by themselves to provide greater alternatives to car travel, they will be necessary and it is important development plays its role in supporting enhanced facilities.	Welcome these comments of support.	No
TfL	Para 11.3.7	Please amend the text to show that the upgrade to Colindale station is expected to be part-funded by contributions from all development within walking distance of the station, in addition to part-funding by the Peel Centre contributions, Barnet Council, and Transport for London.	Agreed. Text revised.	Yes
Finchley Society	Para 11.4.10	After 'It will also take positive action to prevent any pupil parking, promoting car sharing,' add 'providing safe cycle routes' before 'and improved cycle parking facilities . . '	Agreed	Yes
Former MHNF	Para 11.4.10	In our experience school travel plans are developed but rarely adhered to. The Council needs to be far more pro-active in enforcing the plans and reducing car journeys for drop-off and collection of children. Perhaps electric school buses could be introduced with then zero tolerance for parents using their own vehicles, unless on proven medical grounds.	The monitoring of School Travel Plans still form an important role for the Council's Safe and Sustainable Travel Team	No
Barnet Cycling Campaign	Para 11.4.10	It will also take positive action to prevent any pupil parking, promoting car sharing,... <b>ADD</b> and relaxing school uniform rules... It will play its part by providing safe cycle routes, providing 'school streets', Low Traffic Neighbourhoods and 20 mph speed limits to enable more children to walk and cycle to school safely.	Wearing of uniform and school policies in this regard is beyond the remit of the Local Plan and therefore not a matter that it can directly influence.	No

Barnet Cycling Campaign	Para 11.4.12	...and by comprehensively tackling the school run. <b>ADD</b> , ensuring that school travel plans include ambitious targets for walking and cycling.	Agreed	Yes
Finchley Society	Para 11.4.12	The aim of 'comprehensively tackling the school run' is welcome, but is not followed by any proposals. This is a major issue if car traffic is to be reduced and the Council must have concrete actions and specific policies to address it. One possibility would be to require all private schools to offer a comprehensive private hired bus service to take pupils to and from their homes without charge (the aggregate costs to be recouped from school fees). Similar policies are also needed for state schools.	Revised to ensure that school travel plans include ambitious targets for walking and cycling.	Yes
Finchley Society	Para 11.4.14	Are there any Freight Quality Partnerships in Barnet?	There are no Freight Quality Partnerships in Barnet.	No
Barnet Society	Para 11.4.3	Recognition should be made of the likely growth of e-cycling, which overcomes Barnet's topographical challenges.	Agreed	Yes
Finchley Society	Para 11.4.3	This paragraph should recognise that the low take-up is also associated with an often hostile road environment exacerbated by a serious lack of infrastructure due historically to lack of action by Barnet Council to encourage cycling. For those people whom the topography has put off cycling, the rapid increased take-up of e-bikes will mitigate any apparent disadvantage. The low take-up of cycling in Barnet is primarily associated with serious lack of infrastructure and a hostile road environment exacerbated by lack of action by council. For those who have been put off cycling due to hills, the rapid increase in take-up of e-bikes will mitigate any apparent disadvantage....The Barnet LIP strongly supports the delivery of attractive and accessible cycle links especially in development areas <b>ADD</b> - and connecting to those developments.	Text revised to reflect Long Term Transport Strategy and provisions for cycling	Yes
Finchley Society	Para 11.4.7	This paragraph is strangely limited in its aspiration. Improving air quality near schools is indeed vital but the paragraph should also explain how the Council intend to improve air quality in general outside the North Circular Road.	Links are made throughout the Local Plan to the Council's Air Quality Action Plan	No
Barnet Cycling Campaign	Para 11.4.7	Air pollution is thought to have caused 64,000 deaths in the UK in 2015, including 17,000 fatal cases of heart and artery disease. Improving air quality near schools is vital but how does the council intend to improve air quality in general outside the NCR?	Links are made throughout the Local Plan to the Council's Air Quality Action Plan	No
Finchley Society	Para 11.4.9	After 'The Council will seek to ensure that any new transport interchanges are designed' add 'and improvements to existing interchanges made' before 'to help address personal safety issues and . . .'	Agreed	Yes
Barnet Cycling Campaign	Para 11.4.9	The Council will seek to ensure that any new transport interchanges are designed <b>ADD</b> - and improvements to existing interchanges made - to help address personal safety issues and reflect Secured by Design.	Agreed	Yes
Brent Cross South Partnership (DP9)	Para 11.5.10	We support the recognition of the benefits of electric vehicles, however, clarity is required regarding "a proportion" of car parking spaces with electric vehicle charging infrastructure, for example, that it should follow standards in the draft London Plan.	Support welcomed	No
Finchley Society	Para 11.5.11	The last sentence is welcomed. But, more priority for cycling on main roads positively slows buses. Very sophisticated highway engineering is required.. This paragraph - and the Plan as a whole (see 11.6.8, Policies GSS11, TRC02iii and TRC03f, and Table 16) woefully underestimates the need over the Plan period to provide charging points if the Government's policy (no new non-electric vehicles after 2032) is achieved. Before the next draft there must be a section covering this.	Speed of buses is an issue addressed through the Long Term Transport Strategy. Table 16 revised to be in accordance with London Plan Standards – that is 20% active charging facilities with passive provision for all the remaining spaces.	Yes
TfL	Para 11.5.11	We welcome the Council's ambition to minimise transport related carbon emissions. While we welcome a switch to electric vehicles to support this, it should be noted that mode shift away from car travel has the potential to secure reductions in carbon emissions more quickly and with wider benefits such as less congestion.	With high levels of car dependency in the Borough we support a more gradual modal shift that includes use of electric vehicles in line with provisions within the London Plan.	No
TfL	Para 11.5.12	We commend the Council's commitment to ensuring that opportunities to provide public transport operations facilities such as depots, interchanges and bus standing areas will be sought through development proposals. This should be strengthened through including the text within Policy TRC02 or	Agreed	Yes

		other appropriate policy. It is also important that existing operational facilities are protected and enhanced as part of development proposals where appropriate.		
Former MHNF	Para 11.5.3	Construction Management plans must not allow construction traffic to pass through Conservation areas except in very special circumstances.	This is a consideration in a Construction Management Plan	No
Brent Cross South Partnership (DP9)	Para 11.5.6	Specific discussion is incorporated regarding transport infrastructure improvements to be made within the Brent Cross Growth Area. This is noted and welcomed.	Support welcomed	No
TfL	Para 11.5.6	In line with the Mayor's Transport Strategy, interchanges should prioritise onward travel by active modes, followed by other sustainable transport modes. We urge the Council to include a policy commitment to reduce car dominance in and around stations, including though supporting reduced parking, implementing or expanding parking controls and enhancing the public realm around stations to prioritise people walking and cycling.	The Council has indicated its support for active travel and sustainable transport as well as proposing to develop car parking space at stations as part of its approach to reduce car dependency.	No
Brent Cross South Partnership (DP9)	Para 11.5.8	The paragraph states that "The Brent Cross Growth Area will benefit from new and enhanced bus services including...a bus-based rapid transit system." There is no evidence that a bus-based rapid transit system could be installed within the existing highway network, nor is there a funding strategy to deliver it: reference should be removed.	The bus based rapid transit system no longer forms part of the transport improvements for Brent Cross	No
Wade Miller-Knight	Para 11.5.8	Mention of bus-based rapid transit system not detailed any further?	See response above	No
TfL	Para 11.5.8	Would welcome more clarity on what is meant by the 'bus-based rapid transit system' that the Brent Cross Area will benefit from.	See response above	No
TfL	Para 11.6	We commend the Council on the considerable progress they have made on developing car parking standards that will make growth in the borough more sustainable, taking into account the extent of alternatives in different locations. However, we do have concerns regarding the approach at PTAL 5. A provision as high as 0.5 spaces per dwelling represents a level that is significantly higher than the Intend-to-Publish London Plan and something we would object to in principle. We also have concerns about how this 0.5 spaces provision would be justified, linking this to pre-existing controlled parking zones (CPZs) and 'orbital PTAL'. On the former, while we do not have recent CPZ information for Barnet, our understanding is that CPZs cover at least a significant majority of PTAL 5 areas in the borough. If there are areas of development in current or future PTAL 5 that are not currently covered by an existing CPZ, then these should be the prime candidates for CPZ expansion given the extent of alternatives. On the latter, we have significant concerns about the use of 'orbital PTAL'. This is not a robust, objective measure that could be open to inconsistencies and challenge. Our understanding of the proposed measure is bus routes are subjectively excluded based on the angle at which they operate, on the basis that 'radial' bus routes travel towards central London. However, just 4 per cent of Barnet residents' bus trips are to central London,1 while 90 per cent stay in outer London, demonstrating that buses are predominantly used for more local trips, regardless of the direction of travel. On this evidence, PTAL is a robust measure on which to assess connectivity in Barnet, as it is based on the public transport residents actually use. We do however appreciate the desire to complement PTAL, which is why we developed the Travel Time Mapping (TIM) tool, which is available on our WebCAT website2 alongside PTAL. We request that all reference to 'orbital PTAL' is removed, but would be happy for the reference in paragraph 10.6.2 to be replaced by a reference to TIM. We would also be happy to discuss further if we can help develop a more rounded but evidenced-based assessment of connectivity in the borough. Table 23 also does not differentiate areas other than by PTAL. The Intend-to-Publish London Plan requires Metropolitan and Major town centres to be car-free, and for development in outer London Opportunity Areas to have no more than 0.5 spaces per dwelling on average (apart from where more restrictive standards apply). We request that Table 23 is brought in line with this. We also note that the standards in Table 23 set higher maximum standards for larger	Barnet's Car Parking Study and Update sets out the evidence to justify this policy, helping to understand the pattern between property size and PTAL including orbital PTAL in the Borough.	No

		units in most areas. While the Intend-to-Publish London Plan does not differentiate standards based on unit size, we do not object to Barnet doing so in principle, providing that overall provision is within the London Plan standards. We welcome the commitment to the draft London Plan cycle parking standards and would welcome a reference to the London Cycling Design Standards (LCDS) to ensure the right quality as well as the right quantity of parking. We note the requirement for car club parking and membership – car clubs should ideally be used to reduce the levels of parking for privately owned cars, with total provision within the London Plan maximum standards (i.e. car club spaces count towards the maximum allowed).		
Finchley Society	Para 11.6.2	This should recognise that car clubs are more relevant in areas where public transport is poor.	They are more relevant in areas of greater population density	No
Brent Cross South Partnership (DP9)	Para 11.6.3	An extensive car parking study has been provided as part of the evidence base for the Draft Local Plan. This has been reviewed and the level of information set out within the study is welcomed. For non-residential land uses, the Council proposes to refer to standards stipulated within the draft London Plan. However, for residential use, the Council is looking to move away from the direction of the London Plan to allow flexibility in parking provision depending on local development characteristics. Such an approach is welcomed and considered suitable for Barnet, given the varied differences in locations, accessibility and development proposals across the borough. Paragraph 11.6.3 notes “appropriate” levels of parking for disabled people should be provided in all developments; it is considered that further clarity on what constitutes “appropriate” levels should be set out in this paragraph.	This support is welcomed. Policy TRC03 states that provision should be in accordance with the London Plan. Text has been revised to clarify.	Yes
TfL	Paras 11.3.1-4	We welcome the section explaining the current public transport network in Barnet. While overall the section is an accurate reflection of the current situation, there are several points where we would urge greater nuance. Firstly, it should be noted Barnet’s pattern of development along radial rail corridors means that most origins and destinations within the borough also follow that pattern. This means that while the rail networks serve central London, they also serve local destinations as well, such as the local town centre. This is supported by the fact that just 31 per cent of Barnet resident trips on London Underground are to central London, while slightly over half (52 per cent) are to destinations in outer London. Neither travel demand nor the bus network can be neatly divided into trips that are purely ‘radial’ or purely ‘orbital’ and it is important that plans for public transport in Barnet consider where travel is being generated from and attracted to in the round and look to provide the connections that support the greatest number of people. However, the section rightly identifies the challenges of the bus network faces today, both relating to congestion and to the need to improve key connections to provide a wider range of people with a genuine alternative. The advantage of the bus network is its flexibility, and we would welcome further discussion on how best to provide faster, more reliable journeys in a way that better competes with the car (although not purely on journey time, as the whole journey experience is important). These options could include bus priority on key corridors (such as bus lanes, bus priority at junctions, or enhanced bus stops with a larger bus cage to reduce boarding and alighting times, potentially supported by developer contributions) and, as suggested by the following section, changes to existing services or testing different types of service, such as limited-stop routes. Discouraging unnecessary car journeys at the same time as improving services will also be important to support the business case for such improvements. We acknowledge that developing these elements together can be a challenge, but it is one that we are keen to support the Council through.	We welcome the comment and will continue to engage with TfL on assessing and meeting transport demands in the Borough. This section has been updated to reflect the Long Term Transport Strategy and Strategic Transport Assessment.	Yes
Barnet Cycling Campaign	Policy TRC01	While “attractive and accessible cycle links especially in development areas” and “good quality walking surfaces and off-road cycle routes” and adoption of the Healthy Streets approach are all welcome, these should not be confined to development areas.	Agreed	Yes
TfL (CD)	Policy TRC01	This policy should specifically highlight active travel as the mode of transport with the lowest environmental impacts and the highest health benefits.	Agreed	Yes

Barnet Cycling Campaign	Policy TRC01	The thrust of this policy is to minimise the adverse effects of development. By saying the Council will “Refuse proposals that have an unacceptable impact on highway safety or a severe impact on the road network” without defining ‘unacceptable’ and ‘severe’, it is actually saying that some impact on highway safety and congestion is acceptable (contravening CHW04 and ECC01).	Agreed that to enable effective and consistent implementation of policy it is important to indicate what the council considers to be ‘unacceptable’ and ‘severe’.	Yes
Barnet Cycling Campaign	Policy TRC01	These improvements will have very little impact on modal shift away from private car use unless they are accompanied by further measures in this policy that make active travel safer, easier and cheaper than using the car. 1. Providing Low Traffic Neighbourhoods (LTNs) in all residential areas by 2030, which prevent through traffic, but retain permeability for active travel (bus, walking & cycling). 2. Making ‘School streets’ the default arrangement, which close roads outside schools at the start and end of the school day. 3. Increasing parking charges for larger and more polluting vehicles. 4. Ensuring that Barnet is “Smart Road User Charging ready” by 2024 as part of a London-wide scheme. 5. Supporting a dense network of shared mobility schemes by 2024. 6. This policy needs to do much more to enable people to choose cycling as their preferred mode of sustainable transport. Develop a programme on a large scale that will motivate people to cycle their daily journeys, help them to get a bike, provide storage for it and teach them how to maintain it. 7. In parallel, develop programmes that discourage use of private vehicles, including PHVs, for journeys into, through or within Barnet. 8. Provide the infrastructure and traffic conditions that will make people feel it is safe and convenient to cycle: Build 50% of the prioritised strategic cycling corridors (as identified in TfL’s Strategic Cycling Analysis) by 2024 and 100% by 2030. Match other boroughs and TfL by moving to a general 20 mph speed limit. 9. Promote ownership and usage of E-bikes by committing to the installation of charging points within cycle storage areas and working with TFL to deploy hire-Ebikes at locations within the Borough.	The Long Term Transport Strategy is the more appropriate platform for considering these issues in detail. TRC01 has been revised to reflect the LTTS.	Yes
Ramblers Association	Policy TRC01	Add part c) For all development proposals the Council will require, in the first instance, the needs of pedestrians to be considered in respect of: 1) Ensuring good connections to the strategic and local walking networks; 2) A healthy, safe and attractive walking environment within the development; 3) opportunities for improvements to the wider walking environment.	TRC01 has been revised to emphasise improvements for pedestrians and cyclists	Yes
TfL	Policy TRC01	Welcome Council’s commitment to implementing the Healthy Streets Approach (including applying the ten Healthy Streets Indicators) and to achieving the Mayor’s Vision Zero ambition. We also commend the Council for its recognition of the importance of active travel in improving health outcomes and the role reducing car journeys has in improving air quality. We have some minor suggestions how the Council could further build on this policy to achieve its stated aims. Firstly, the policy seeks to deliver a more sustainable network by ‘...encouraging sustainable modes of transport’. While encouragement is always welcome, it is important that interventions enable more sustainable mode choice, for instance by ensuring walking and cycling routes are safe and attractive, and that public transport connections are quick and reliable. We will work with the Council to develop plans to do this. We support Council’s position of refusing proposals that have an unacceptable impact on highway safety (although ‘increase in road danger’ would more accurately focus this point on the source of risk). We agree with the intention of avoiding ‘severe impact on the road network’ although would encourage the link to parking policy to be considered, as reduced parking provision reduces significantly the impact on road network performance. The Council could also expand on all major development proposals being expected to contribute towards wider active travel improvements, such as through delivering enhanced public realm, improved street crossings, or additional cycle parking at nearby stations or town centres. We welcome requirements for Transport Assessments, Travel Plans and Construction Management/ Delivery and Servicing Plans for major developments, although Transport Statements may also be appropriate for minor development. We would appreciate a reference and/or link ( <a href="https://tfl.gov.uk/info-for/urban-">https://tfl.gov.uk/info-for/urban-</a>	TRC01 has been revised. The Council continues to support modal change and will continue to seek ways to bring forward initiatives to facilitate active travel. Text revised to focus on highway safety. There is no stipulation in the London Plan to make Transport Assessments a requirement for minor developments.	Yes

		planning-and-construction/guidance-for-applicants) to TfL guidance on how to produce these documents to help ensure the right information is included.		
Former MHNF	Policy TRC01	Where multiple developments come forward in an area from different developers, they should be required to assess the transport infrastructure in combination, fully assessing the impact of all developments when they are all fully built out. Equally their cumulative impact on air quality must be assessed realistically and objectively	TRC01 requires a construction management plan and/or a delivery and servicing plan for all major developments. Environmental Health colleagues are able to consider cumulative impacts on air quality.	No
Brent Cross South Partnership (DP9)	Policy TRC01	TRC01 aims to "deliver a more sustainable transport network ... by reducing car dependency, encouraging sustainable modes of transport and improving air quality", whilst one of the key objectives of the Local Plan is to improve sustainable travel options including walking and cycling. However, the measures set out within Policy TRC01 do not clearly set out measures that will be taken to promote walking and cycling within Barnet. Whilst TRC01 does identify support for the Healthy Streets approach (which amongst other things incorporates new walking and cycling routes), the policy predominantly focuses on public transport infrastructure delivery and development impact on the highway network. This is considered a missed opportunity to promote two modes critical to achieving TfL's modal shift objectives. The Draft Local Plan recognises that issues exist with orbital travel within the Borough (paras 2.6.1, 11.3.2) and improvements to orbital public transport are identified as being of importance "if suitable alternatives to car use are to be delivered effectively" (para 2.6.4). However, TRC01 does not reference these improvements, and it is not clear what steps will be taken to address this identified issue. This policy references "severe" and "adverse" impacts. It would be helpful if definitions of these words could be provided so these impacts are measurable.	TRC01 revised to amplify steps to promote walking and cycling.  References to improvements to orbital travel have been added.  Severe and adverse impacts clarified	Yes
New Barnet Community Association	Policy TRC01	While promoting active travel and reducing car usage there seems to be a lack of measures to enable this.	TRC01 revised to amplify steps to promote walking and cycling.	Yes
Brent Cross South Partnership	Policy TRC02	Reference to the new bus station at Brent Cross should clarify that it is to replace the existing Brent Cross Shopping Centre bus station and is not within the BXS scheme	Agreed	Yes
Ramblers Association	Policy TRC02	Map outlining Strategic Walking Network and add reference to part a).	The Local Plan together with the Long Term Transport Strategy promote strategic walking routes such as the Barnet Loop which has been added to the Glossary.	Yes
Former MHNF	Policy TRC02	This policy should specifically recognise the significant current deficit in tube line operations to/from Mill Hill East. The shuttle service to/from Mill Hill East is woefully inadequate today and as more properties are occupied in Mill Hill East the situation will become much worse without positive action. More trains need to be through trains throughout the day and the trains need to be much more frequent, say every 6-8 minutes rather than 12-15.	Growth within the Mill Hill East area will support improvements to public transport. Policy GSS07 has been revised to outline more specific improvements.	Yes
Barnet Cycling Campaign	Policy TRC02	The plan recognises the need to invest in public transport lines and interchanges and we support investment in orbital and radial public transport.	Support welcomed	No
Barnet Cycling Campaign	Policy TRC02	Secure cycle storage / stands should be provided near key bus stops to enable mode sharing e.g. cycling a short distance and then catching the bus to travel further is particularly useful for longer or hilly orbital journeys like Routes 251, 107, and 307. Ensure that cycle parking is adequate and easily visible to public view to discourage theft and that secure "cycle hubs" are provided at large busy stations. Cycling speeds can be faster than motor traffic, especially when segregated cycle lanes are provided. It is vague on plans for infrastructure that will enable people to use buses, walking and cycling to reach new train and underground stations. Barnet needs to provide infrastructure for buses and to enable people to cycle safely around the borough. 1. Support more bus lanes and the introduction of bus gates in healthy streets neighbourhoods to make bus journeys more efficient than car journeys. 2. Complete a borough-wide cycle network by 2030, based on TfL's Strategic Cycling Analysis, with enhancements where further needs can be identified. 3. Develop area-wide healthy streets neighbourhoods (low traffic	The Long Term Transport Strategy (LTTS) is the more appropriate platform for considering these issues in detail. TRC02 has been revised to reflect the LTTS.	Yes



		neighbourhoods) to cover the entire borough by 2030 - it is not sufficient to confine healthy streets to new developments and occasional public realm schemes. 4. Provide secure cycle parking and cycle hubs.		
Finchley Society	Policy TRC02	TRC02vi How does this fit in with the North Finchley SPD?	This is consistent with the North Finchley SPD	No
TfL	Policy TRC02	We strongly welcome the Council's support of delivery of new and enhanced transport infrastructure. Under part a iv), we request that the Council refers to Brent Cross West station as part of the West London Orbital. Under part a v), we request that the Council refers to 'stopping and standing' rather than just 'stopping'. It is vital for ensuring bus reliability that bus stands are retained or appropriately re-provided through new development. We welcome continued close working with the Council to enhance rail services in Barnet, including enhancing London Underground stations. We would welcome further discussion on a range of potential improvements, such as delivering step-free access, expanding gatelines, improving station capacity, and/or improving line capacity. An essential element of enhancing rail capacity is through protecting land for transport use and we urge the Council to give this adequate protection. Line capacity enhancement in particular needs land to be protected for future stabling requirements. TfL will work with the Council to determine the exact nature of future stabling requirements, and we would strongly welcome a policy commitment to protecting land for this.	Agreed. We welcome support on this policy and refer to our discussions with TfL about stabling and future capacity plans.	Yes
Barratt London (QUOD)	Policy TRC03	Where car free residential development is proposed in areas of PTAL 5 and 6 the policy requires a CPZ to be in place within the immediate vicinity of the development before occupation. Do not consider this policy to be sound as it is not flexible and may, due to unforeseen circumstances fetter development, as the acceptability and adoption of the CPZ will be dependent on third parties. The wording should be revised to state that "Where car free residential development is proposed in areas of PTAL 5 and 6, if it is deemed that a CPZ is necessary, then this should be in place within the immediate vicinity of the development before occupation".	Agree	Yes
Redrow Homes	Policy TRC03	Part b) to require contributions from developments towards CPZ's where it can be shown they would have an adverse impact on parking.	Agreed. Contributions will be justified.	Yes
Fairview Estates	Policy TRC03	TRC03 sets out the required level of car parking for new development within the Borough. The parking requirements set out in the plan does not comply with the standard detailed within the intent to publish London Plan. The policy requires more car parking spaces to be provided for 3+ bedroom units than set out within the London Plan.	Barnet's Car Parking Study sets out the basis for the locally specific approach to parking provision. The Council accepts the need for restraint in terms of car parking management, but intends to apply the standards set out in Table 23 with sensitivity to local circumstances.	No
TfL	Policy TRC03	Welcome the approach to reduce car use, implement Healthy Streets and achieve Mayors Vision Zero ambition. Concern in regard to higher provision of spaces per dwelling (0.5) than London Plan. Would welcome further dialogue on approach to CPZs.	Barnet's Car Parking Study sets out the evidence to underpin this policy, helping to understand the pattern between property size and PTAL in the Borough.	No
TfL CD	Policy TRC03	Table 23 does not fully accord with Table 10.3 of the draft NLP which requires that all areas in London with a PTAL of 5 or 6 should be car free. The Council's proposed standard is also higher than the draft NLP for sites with PTAL 4, 3 and 2. Oppose the paragraph b) requirement for a CPZ to be in place within the immediate vicinity before occupation of a 'car free' development. the introduction of a CPZ does not fall within the control of an applicant and this objective has to be driven and promoted by the Council.	See response above	No
Former MHNF	Policy TRC03	Parking Management. This area should recognise the impact that "smart technology" can bring forward and LBB should take every opportunity to lead in the utilisation of new technology to, for example, make payment for parking "on exit" a reality both in car parks and for on street parking. This would greatly reduce parking penalties and the need to pay staff to issue them. This would also inform drivers where	Technology has an important part to play in ensuring efficient use of car parking spaces. The Plan is not the right document to set out what this technology is but it is certainly an area that the Council is looking at.	No

		there is space to park in real time, thus reducing the congestion caused by hunting for a space, which is estimated to take up 30% of time around Town Centres.		
Friern Barnet and Whetstone Residents' Association	Policy TRC03	<p>4. Car Parking - in the context of new housing provision – the practice of using the streets as a dumping ground for overspill parking. One of the consistent features of planning outcomes in Barnet has been a willingness of the Council to allow on-street parking to count towards car parking provision required for new residential developments and conversions. This has had the consequences that the Borough's roads have become increasingly difficult to navigate, with parked vehicles narrowing the available carriageway resulting in increased congestion, pollution and longer journey times and also, as much parking by residents in proximity to their homes is long term (as many travel to work by public transport, leaving the car behind), the pool of on-street parking spaces available for short term parking by visitors to an area – whether tradesmen, shoppers or others is diminished. Para 11.6.5 states “Where development proposals are on the edge of a CPZ, to ensure there is sufficient on-street capacity, a parking survey will be required of the streets outside the CPZ.” – thus demonstrating that the authors of the plan envisage the practice of using the streets as a dumping ground for overspill parking will continue! The cause of the problem is twofold-First, the willingness of the Council to allow on-street parking to count towards required car parking provision and, secondly, the use (in common with many other local authorities) of the so-called “Lambeth Parking Survey” model. We believe that the Lambeth model is fatally flawed and should no longer be used by Barnet Council. The Lambeth model focusses on measuring parking availability for residents living in the immediate vicinity of an application site. Thus the Lambeth guidelines state (for residential developments): “The Council requires a parking survey to cover the area where residents of a proposed development may want to park. This generally covers an area of 200m (or a 2 minute walk) around a site “The survey should be undertaken when the highest number of residents are at home; generally late at night during the week. A snapshot survey between the hours of 0030-0530 should be undertaken on two separate weekday nights (i.e. Monday, Tuesday, Wednesday or Thursday).” It will be seen from the above that the purpose of the survey is to demonstrate that there is sufficient on-street capacity to accommodate overnight “overspill” parking from the proposed development. The methodology fails to measure or to protect daytime availability for short term parking. Further, Policy TRC03 provides for a maximum level of parking provision, not a minimum. In the context of a need to protect the availability of short term on-street parking for visitors to a locality it follows that a policy which sets a maximum, but not a minimum is flawed. This needs to be addressed. We propose that: 1. The Plan commentary should expressly recognise that long-term on-street parking by residents of new residential developments and conversions is unacceptable and that all anticipated long term parking needs of the residents of such developments must be met by on-site parking provision. 2. Policy TRC03 should be amended to read “a) the Council will require that residential development (including conversions) will provide on-site parking in accordance with Table 23 and so as to accommodate on-site all anticipated long term parking needs of the residents. For multi-unit proposals the maximum parking provision will be rounded up to the next whole number.” 3. Barnet abandons the Lambeth methodology and, in exceptional cases where a car parking survey is still needed, adopts a replacement that addresses availability of daytime parking for short-term use. Note that 11.6.5 would need revision.</p>	<p>It has been long established national policy that a restraint based approach is used for car parking. The Council continues to support and justify a bespoke residential parking policy for Barnet which responds to local circumstances.</p> <p>The approach to restraint based car parking in the Local Plan is consistent with what is set out in Para 18.8.5 of the 2012 Local Plan Development Management Policies document.</p> <p>The technical details of parking survey methodology are more of a matter for the Highways Service and the Local Plan makes no specific reference to the modelling used. The ‘Lambeth Council Parking Survey Guidance Note’, although not the only methodology, is the most established guidance document for parking studies across London. Investigation of the impact on highway conditions forms an important part of the Council’s analysis of proposed developments and, therefore, it is essential that enough information is submitted by a developer to allow a full analysis of the issue. The Lambeth Model provides the basis for this analysis. However, as behavioural patterns change a different methodology could be applied.</p>	Yes
Marsfield (Avison Young)	Policy TRC03	Car ownership rates and travel patterns of older people are different to younger people, accordingly they generate different car parking needs. Furthermore, SOPH schemes (such as Marsfields’ Later Living concept) incorporate communal/shared private transport services such as car-clubs and chauffeured cars which have a further impact. Accordingly, in our view it is inappropriate to apply ‘regular’ residential car parking standards to SOPH and that a more bespoke approach is required. Accordingly, we recommend that Policy TRC03 is amended to make clear that residential car parking	Policy applies to all residential development and factors in public transport accessibility. Requirements can be applied flexibly if residents in such accommodation have mobility impairments.	No

		standards do not apply to SOPH, where provision should be assessed on a case by case basis. The same principle applies to cycle parking.		
Brent Cross South Partnership (DP9)	Policy TRC03	We agree that flexibility should be applied as stated in supporting text, and this should be reflected explicitly in policy wording. Section g) of Policy TRC03 states “spaces should be available for car club vehicle parking along with car club membership for future residents of the development”. Clarification is sought as to whether this would apply to all residential development (regardless of size and type), and whether such parking provision is expected to be provided off-street or on-street. We suggest that flexibility is applied to this policy and this requirement is considered on a site by site basis taking account of the specific proposals and site-constraints.	The policy focuses on residential development and car clubs can form part of the overall parking provision. There is an expectation that provision is off street..	No
Former MHNF	Policy TRC03	The London Plan standards for EV Charging points in new developments should provide the capability at 50% of all spaces if we believe electric vehicles (rather than say hydrogen) become the way forward. Many more electric charging points need to be provided at on street parking points, perhaps 20% of all spaces, such that they become the norm, not the exception. Taxi charging points and EV charging across the area must be increased widely rather than just in new developments.	Table 16 revised to be in accordance with London Plan Standards – that is 20% active charging facilities with passive provision for all the remaining spaces.	Yes
Home Builders Federation	Policy TRC03	Table 23 – Residential Car Parking Standard – will need to be updated in line with the Secretary of State’s directed changes to the Draft London Plan. Part f) requires that electric vehicle charging points are provided in line with the Draft London Plan. Despite what the Draft London Plan says, HBF would advise against making policy in this area owing to several complications. HBF prefers a national and standardised approach to the provision of electrical charging points in new residential developments. We would like this to be implemented through the Building Regulations rather than through local planning policy. If the Council does choose to make policy in this area there are several issues that it will need to consider carefully. The Council’s work should be supported by evidence demonstrating the technical feasibility and financial viability of his requirements. Any requirement should be fully justified by the Council including confirmation of engagement with the main energy suppliers to determine network capacity to accommodate any adverse impacts if all, or a proportion of dwellings, have charging points. We argue this because if re-charging demand became excessive there may be constraints to increasing the electric loading in an area because of the limited size and capacity of existing cables. This might mean that new sub-station infrastructure is necessary. There are also considerable practical difficulties associated with provision to apartment developments or housing developments with communal shared parking rather than houses with individual on plot parking. If residents do not run cars, let alone electric cars, they would be forced to pay for the electricity consumed by electric car owners as this cannot be apportioned to the electric car owner. This would be unfair on non-car users. This will be an important consideration as the Local Plan requires the construction of flats as the most common residential type. The NPPF requires that any policy, including a requirement for charging points, should be clearly written and unambiguous (para 16). The policy will need to specify the quantum and type of provision sought either AC Level 1 (a slow or trickle plug connected to a standard outlet) or AC Level 2 (delivering more power to charge the vehicle faster in only a few hours) or other alternatives. Part g) – the council states that car club spaces should be provided. It should clarify if this is also a requirement for car-free developments in PTALs 5 and 6. Part g) also specifies that car club membership should be provided for future residents of the development. The Council will need to clarify its intentions here. Is this for both new and existing residents? Does this include children too? How will the applicant be expected to calculate the number of future residents? How does the Council expect to calculate the financial implication of this for its viability appraisal? For example, Enterprise Car Club advertises an annual membership fee of £60.	The Council continues to support and justify a bespoke residential parking policy for Barnet which responds to local circumstances. It therefore justifies a variation with the London Plan in respect of residential standards. We consider that in terms of the electric charging standards the London Plan has the right approach. Text has been revised to clarify that car clubs form part of overall parking provision. Wording has been revised to clarify terms of car club membership.	Yes
CPRE	Policy TRC03	We have serious concerns about policy on parking as per policy TRC03 which does not discourage private car ownership enough or promote car-clubs as a viable alternative. <u>This policy and Table 23 should be amended to state that the starting point for all development is that is should be car-free, new</u>	The Council has applied a more flexible approach to residential development that is reflective of Barnet’s local context. The supporting text for TRCO3	No

		development will be planned around car clubs / hire schemes rather than private car ownership, where PTALs are low, transport will be improved to ensure people can live car-free, the maximum parking spaces per unit for new development in low PTAL areas will be 0.3 (to ensure new development is planned around sustainable transport), where provision is made for private car ownership, that this is located at the edge of development and in such a way that the space could be re-provisioned for other uses, in anticipation of private car ownership falling.	recognises that as an outer London borough, it faces the challenge of low levels of public transport accessibility and a lack of orbital travel options, which warrants a flexible approach.	
London Living Streets	Policy TRC03	Does not discourage private car ownership enough or promote car-clubs as a viable alternative. This policy and Table 23 should be amended to state that the starting point for all development is that is should be car-free, new development will be planned around car clubs / hire schemes rather than private car ownership, where PTALs are low, transport will be improved to ensure people can live car-free, the maximum parking spaces per unit for new development in low PTAL areas will be 0.3 (to ensure new development is planned around sustainable transport), where provision is made for private car ownership, that this is located at the edge of development and in such a way that the space could be re-provisioned for other uses, in anticipation of private car ownership falling.	The Council has applied a more flexible approach to residential development that is reflective of Barnet's local context. The supporting text for TRCO3 recognises that as an outer London borough, it faces the challenge of low levels of public transport accessibility and a lack of orbital travel options, which warrants a flexible approach.	No
Harrison Varma Ltd	Policy TRC03	The proposal to encourage a wider use of car-free development and/or more limited levels of car parking to residential developments within more accessible locations is supported. This will assist in ensuring that the capacity of such sites can be optimised as far as is possible which supports the overall delivery of additional units in locations in or adjacent to town centres and transports hubs. Reduced requirements for car parking capacity will allow more units to be delivered in locations where public transport is easily available.	The Council welcomes this support.	No
Barnet Cycling Campaign	Policy TRC03	Policy focuses on what's allowed in new developments but needs to extend borough wide and support policies ECC01, TRC01 and TRC02 to discourage private car use and favour active travel by: 1. Restricting parking on bus routes to allow free passage for buses and cyclists. 2. Extending bus lanes on the wider main bus routes and making them operational 7 days a week. 3. Increasing parking charges for larger and more polluting vehicles in car parks, CPZs and on street. 4. Providing economical, secure cycle parking for every resident – using on street bike hangers where needed in place of parking spaces. 5. Enforcing the ban on pavement parking and committing to a phased reduction in on-street parking. 6. Providing car club vehicle parking where appropriate. 7. Restricting the types of vehicle allowed to park in new developments to smaller and less polluting models or electric vehicles. 8. Assisting residents with personal travel planning and rewarding residents who give up car ownership, allowing Barnet to meet the residential parking standards given in the draft London Plan (rather than the increased levels proposed in Table 23).	The Long Term Transport Strategy (LTTS) is the more appropriate platform for considering these issues in detail. TRC02 has been revised to reflect the LTTS.	No
Redrow Homes	Policy TRC03	Support	Welcome the support	No
Barnet Cycling Campaign	Policy TRC04	Policy needs to recognise the value of enabling working from home to reduce the overall need to commute, not only to travel outside peak periods.	Agree – this point has been highlighted by Covid19 and enforced behavioural change. Reference added to facilitating home working.	Yes
Former MHNF	Policy TRC04	New developments should provide fibre connection into each and every property. This is vital to support the high numbers of homeworkers and periods of self-isolation.	This is now an expectation of developers and landlords from new home owners and tenants. Part R1 of the Building Regulations 2010 requires buildings to be equipped with at least 30 MB/s ready in-building physical infrastructure, however new developments using full fibre to the property or other higher-grade infrastructure can achieve connectivity speeds of 1GB/s.	No

Pocket Living	Table 23	To maximise delivery of affordable homes, Pocket Living developments are car-free and suggest the footnote excludes 'so that provision across the site is less than 1.5 spaces'.	HOU01 makes reference to innovative affordable housing products. The Plan is clear on which locations may be suitable for car free housing .	No
LB Brent	Table 23	The Council notes that some of these standards, more specifically those for the low PTAL areas, are more generous than those set out in the Secretary of State's Direction to modify the Intend to Publish London Plan. It understands the challenges around encouraging more sustainable forms of travel in low PTAL areas and that LB Barnet is prioritising the majority of its development in areas with higher levels of PTAL to reduce car dependency. Nevertheless, increasing parking provision will encourage greater movement by car, producing additional trips outside the LB Barnet. As such LB Brent encourages LB Barnet to use the parking standards in the emerging London Plan. Amend residential parking standards to be consistent with those in the London Plan.	The Council continues to support and justify a bespoke residential parking policy for Barnet which responds to local circumstances. It therefore justifies a slight variation with the London Plan This will be reflected in our Statement of Common Ground	No
Redrow Homes	Table 23	Table 23 should be brought in line with Table 10.3 of the draft London Plan.	The Council has applied a more flexible approach to residential development that is reflective of Barnet's local context. Supporting text for TRCO3 recognises that as an outer London borough, it faces the challenge of low levels of public transport accessibility and a lack of orbital travel options, which warrants a flexible approach.	No
Finchley Society	Table 23	These figures are noticeably higher than those in the Draft London Plan. They will have to be supported with evidence - what demand will be, and the effect on the road network..	These figures are supported by Barnet's Car Parking Study 2019	No
Barnet Cycling Campaign	Chapter 12	With ongoing delays to schemes in North Finchley and Brent Cross, it would be useful to know how much has been spent since 2011 on walking and on cycling and what has been delivered. Studies have consistently shown that investment enabling people to cycle has a far higher benefit to cost ratio than investment in other transport modes – at least 5:1 and up to 20:1 or more in some cases. For next stage of consultation, we urge the Council to publish a revised Local Plan and associated IDP that takes walking and cycling seriously and commits to ambitious interventions, target dates and spending.	The Long Term Transport Strategy sets out proposals for increasing walking and cycling. The Local Plan has been updated to reflect the progress of the Transport Strategy. The IDP has been published with the Local Plan Reg 19.	No
Elizabeth Silver	Chapter 12	Sustainable development is widely understood to mean <i>'development which meets the needs of the present without compromising the ability of future generations to meet their own needs'</i> . ( definition set out in Our Common Future, a report by the UN World Commission on Environment and Development - the Brundtland Commission- in 1987 ) It is critical that provision for healthcare, water and sewage need to be put in place before development starts, not when the last resident has moved into a development. Some spare capacity for these has to be built in to the plan, otherwise the development is unsustainable. Healthcare facilities should not rely on CIL and S106 contributions. Developers can claim exemption on grounds of economic viability. It is known that the CIL and S106 pots are sometimes not even accessed for use in the development for which they were levied. Comment: The alternative is chaotic; Water shortages are predicted in 30 years' time. <a href="https://www.standard.co.uk/news/uk/london-and-southeast-face-major-water-shortages-by-2050-environment-agency-warns-a3846226.html">https://www.standard.co.uk/news/uk/london-and-southeast-face-major-water-shortages-by-2050-environment-agency-warns-a3846226.html</a>	The Reg 19 Local Plan is supported by the Infrastructure Delivery Plan (IDP) which provides an assessment of current infrastructure provision, future needs, gaps and deficits, along with an indication of costs of providing infrastructure.	No
Metropolitan Police Service	Section 12.2	Requirement for 2.5-5 hectares of open industrial land is required for a car pound by the MPS in addition to a neighbourhood police facility.	The Council supports the efficient use of land, primarily to deliver new homes. Therefore Barnet cannot meet the requirement for a car pound. In terms of a neighbourhood police facility, town centres seem the most appropriate location for such provision.	No
Finchley Society	Section 12.2	This section rightly states that the Infrastructure Development Plan is a key part of the Local Plan. In particular, residential development must be phased to allow for social infrastructure to be put in place. It would have been convenient to comment on a draft Infrastructure Development Plan as a part of this	The IDP has been published. It is a living document subject to update.	No

		consultation, but no draft of it seems to be available. It is essential for it to be available for comment well before the Regulation 19 consultation begins.		
Barnet Cycling Campaign	Section 12.2	Infrastructure Delivery Plan (IDP) doesn't appear to have been published, to show what has been delivered, since November 2012 and a revised IDP will not be issued until the next stage of consultation.	The IDP has been published. It is a living document subject to update.	No
Brent Cross South Partnership (DP9)	Para 12.1.1	This paragraph should also reference the use of planning conditions as a possible mechanism for delivering infrastructure.	Planning conditions are not a robust mechanism for infrastructure delivery	No
TfL	Para 12.1.1	This text should be amended. Planning obligations are used to address site specific issues and must meet the three legal tests in the Community Infrastructure Levy (CIL) regulations. Notably, recent changes to the CIL regulations have also removed Section 106 pooling restrictions and the requirement for a regulation 123 list, and Section 106 and CIL can now be used to fund the same piece of infrastructure.	Text revised	Yes
Geoffrey Silver	Para 12.2.1	So why is there now overcrowding on trains leaving Mill Hill East in the morning rush hour?	Mitigating problems with overcrowding is considered through the IDP, Long Term Transport Strategy and Strategic Transport Assessment	No
Brent Cross South Partnership (DP9)	Para 12.2.1	The Infrastructure Delivery Plan forms a key part of the evidence base. We would welcome clarity on the status of this document and how draft policies will be informed by its findings.	The IDP and Infrastructure Funding Strategy have been published as part of the Reg 19.	No
TfL	Para 12.3.1	This text should be amended. Government has published amendments to the CIL Regulations, which took effect on 1 September 2019.	Text revised	Yes
TfL	Para 12.4.1	NPPG sets out that formulaic approaches to planning obligations should not be set out in SPDs, as they are not examined. The Council may wish to consider what obligations may be subject to formulas and include these in the local plan, particularly in relation to supporting improved bus services and managing any cumulative impacts of growth.	Text revised to clarify this.	Yes
Barnet CCG	Para 12.4.1	Supports section on planning obligations and welcomes this paragraph which recognises that section 106 contributions may be secured for an item of infrastructure, in-kind, or a financial contribution towards it.	Support welcomed.	No
Metropolitan Police Service	Para 12.4.4	Welcome inclusion of policing under S106/CIL contributions and would like to work with the Council on this matter	The Council welcomes this support	No
Finchley Society	Para 12.4.4	This section should indicate how much has been and is being achieved through Section 106 agreements before relying on them for the provision of schools, health facilities etc. This reliance seems very optimistic	This is covered in the Authorities Monitoring Report which is published annually	No
Barnet CCG	Para 12.7.1	Referring to a set of key indicators and targets developed to monitor the effectiveness of policies against the objectives, these indicators and targets should be included in the draft plan.	Agreed – this has been added to Chapter 12	Yes
Former MHNF	Para 12.8.1	The Council's powers and commitments to enforcement should be fully explained and clarity re Enforcement Action that will be taken in cases of infringement clearly expressed. We emphasise the need for a Code of Construction Practice to be issued by the Council. We believe that there should be more encouragement of Neighbourhood Planning generally in the Local Plan with more provision of hooks from which locally specific policies can hang. Further, it should be clear how Neighbourhood Forums will influence the use of the 25% share of CIL (Community Infrastructure Levy) payments that are to be set aside for initiatives in their designated area.	More detail of the Council's activities on enforcement has been added. The appropriate platform for advice on neighbourhood planning is the Council's planning webpages.	Yes
St William Homes LLP	Para 15.2.1	The Council has applied the density matrix from the London Plan (2016) to assess the indicative residential capacity of sites (paragraph 15.2.1). The draft London Plan deletes this approach to density and instead adopts a design led approach with intention to optimise housing delivery, therefore Barnet's draft Plan should be updated to reflect this.	To ensure consistency on this approach the sustainable residential quality (SRQ) density matrix has been used to provide a standard means of calculating indicative residential capacity. This	No

			provides a good basis for a more detailed design led approach as proposals near the planning application stage.	
HADAS	Glossary	Add: HADAS – The archaeological society for the London Borough of Barnet. The Hendon and District Archaeological Society (HADAS) was founded in 1961 to find and prove, on the ground, the Saxon origins of Hendon. Since that time the Society has expanded in area, today encompassing the whole of the London Borough of Barnet and its expertise, excavation and research now covers all archaeological periods. <a href="http://www.hadas.org.uk">http://www.hadas.org.uk</a>	Agreed	Yes
TfL	Glossary	<b>PTAL</b> stands for Public Transport Access Level (to distinguish it from physical/step-free accessibility) and <b>TLRN</b> stands for Transport for London Road Network.	Agreed	Yes
Modomo (Modular Housing)	Glossary Meanwhile Uses	Expansion of definition to 'The temporary use of vacant buildings or land for a socially beneficial purpose <u>including residential use</u> , until such a time that they can be brought back into commercial <u>or residential use again</u> .'	Agreed	Yes
Historic England	Annex 1	We would like to stress the importance of taking historic assets, and their settings fully into account when assessing the suitability of sites for development and their suggested uses/capacities. Generally we are pleased to see the allocations expressed as a schedule with specific development considerations. Where heritage assets have been identified they have been indicated clearly as factor that must be taken into consideration when designing potential schemes. This will help guide development positively. We welcome reference to locally listed buildings as planning considerations where relevant. We advise that more detail is added to the site specific development criteria set out in Annex 1 as the plan progresses. For example, where potential allocations will impact upon the setting of conservation areas we advise that key local views identified in conservation area appraisals are specifically mentioned in the site description and as a specific planning consideration. We are pleased to see that the site specific criteria make it clear where tall building will not be appropriate but feel that this could be done more consistently e.g. in East Finchley and in other areas where the Tall Buildings Update has found them to be inappropriate for tall buildings. While we have identified areas where site specific policies should be improved we raise no objection to any in principle provided.	Proposals revised to reflect any historical asset	Yes
Mayor of London	Annex 1	The Mayor welcomes including the projected PTAL at 2031 in the Site Allocations. Public land sites and surplus transport infrastructure are subject to a 50% affordable housing threshold, except where the Mayor has agreed a portfolio approach.	The Council is aware of this approach.	No
North Finchley TC (Quod)	Annex 1	Annex 1 identifies the supply of sites needed to meet the projected level of growth within the borough, which includes a number of sites within North Finchley. Our client supports the allocation of development sites within North Finchley but has comments in respect of Sites 58 and 61.	The Council welcomes this support.	No
Barnet CCG	Annex 1	Large developments on sites which include a significant number of new homes will generate a site-specific impact on healthcare, which will need to be addressed by new on-site provision and/or a s106 financial contribution. The CCG would welcome the opportunity to discuss the impact of these sites on healthcare infrastructure, particularly in the Edgware Growth Area.	The Council will ensure continuous engagement with the CCG in discussion on the potential healthcare infrastructure impacts of proposals as it has recently with the Edgware Town Centre SPD.	No
Harrison Varma Ltd (Savills)	Annex 1	In preparing Site Allocations, the residential density matrix that formed part of the London Plan (2016) has been used. Whilst it is accepted that this provides for a consistent initial analysis for potential density in order to establish the potential to meet the Local Plan's housing target, it is not considered appropriate that this will be the only basis on which capacity should be based. The density matrix is not being carried through into the replacement London Plan that is due to be adopted in 2020 (and certainly prior to the further assessment and adoption of the Council's Local Plan). Replacement London Plan Policies GG2 and H1 are both clear that optimum development capacity of all sites should be determined via a design-led approach that also supports intensification of locations that are well-connected to public transport. Given the late stage of the examination of the replacement London Plan, considerable weight should be	The Council's approach has been to assess site capacity on site size and public transport accessibility level (PTAL). This has helped determine the range of appropriate dwelling densities for residential development, and thus an indicative number of dwellings.  To ensure consistency on this approach the sustainable residential quality (SRQ) density matrix	No

		<p>given to the policies contained within it. This means that capacity of any Site Allocation should not be limited by the previous density matrix; any housing figure for a site that is generated via the density matrix should be considered as a minimum with further capacity encouraged where design and amenity considerations allow. To this should be added that following the formal response dated 13 March 2020 from the Secretary of State to the Intention to Publish version of the London Plan, it is clear that the Government considers that housing delivery most go even further than the levels including in the London Plan. This places even greater emphasis upon the need to optimise all sites as far as is possible and not be limited by a matrix that does not reflect current requirements. All Site Allocations should therefore be clear that indicative capacity is a minimum and additional units should be delivered wherever possible via a design-led optimisation of the site. In each of these cases, the sites have the potential to deliver additional residential units that will play a part in the Borough achieving and exceeding its housing delivery targets. Opportunities to optimise delivery on each site could further increase the number of units that could be delivered through well-designed schemes that respond to the specific character and context of each location. Both sites should therefore be assessed in more detail as part of the ongoing Local Plan adoption process.</p>	<p>has been used to provide a standard means of calculating indicative residential capacity.</p> <p>The Council welcomes submissions of proposals that support intensification in locations that are well connected to public transport. Such proposals can come forward and be supported within the existing planning framework.</p>	
London Diocesan Fund (Iceni Projects)	Annex 1	<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 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).</p>	<p>The Council's approach on Green Belt is clear and justified. It is consistent with the London Plan and national policy.</p>	No
Environment Agency	Annex 1	<p>Of the 67 sites, 5 have significant areas within the site of Flood Zone 2 and 3 (medium and high risk of flooding from rivers). Two of the sites although mostly in Flood Zone 1 (low flood risk) have some partial risk (Flood Zone 2 and 3). We have significant concerns about two of the sites proposed (Site 6 Watling Avenue car park and market and Site 9 Colindeep Lane) due to the severity of the potential flood risk.</p>	<p>We refer to our responses on sites</p>	Yes
East Barnet Residents' Association	Site 1	<p>Acceptable if a sympathetic development adheres to the planning considerations stated.</p>	<p>We welcome this support</p>	Yes
Historic England	Site 1	<p><i>See response for full list of heritage assets that could be impacted by development of this site. We are pleased to see that the schedule makes reference to the onsite listed building and adjacent church, and that consideration must be given to these assets. However, there is a relatively high concentration of designated heritage associated with this site and we advise that heritage could be better represented as a key issue to consider in the development of this site. We advise that the policy is amended to better describe the heritage assets on and adjacent to the site, as well as the potential presence of archaeological remains. The policy should also make specific reference to their setting.</i></p>	<p>Agreed</p>	Yes
HADAS	Site 1	<p>Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.</p>	<p>Agreed</p>	Yes
Home Group	Site 10	<p>Home Group is one of the UK's biggest housing associations and provides long term integrated housing, health and social care. As a social enterprise and charity all surplus income generated outright sales activity is reinvested in social homes and communities. In the London Borough of Barnet, the 3.9ha Douglas Bader Park Estate currently provides 271 existing homes, comprising of a mix of 140</p>	<p>We welcome this support and the background information on Site 10. Proposal has been updated</p>	Yes



		houses and 131 flats. Home Group owns the freehold to the site, and all homes are rented (26 are Affordable Rent, with the remaining 245 Social Rent). In 2016 a full assessment was carried out of the Douglas Bader Park estate, identifying homes within the estate that failed to meet the aspirations of Home Group to deliver better quality accommodation for their customers. The majority of the properties (99.3%) on the estate fail to meet London Plan Space Standards, with the current floor area totalling 15,771sqm whereas there is a requirement today for 20,524sqm for the equivalent unit size mix. Additionally, the homes were built in the 1970s utilising Wimpey No Fines and will need significant investment to maintain both now and in the near future. Many of the homes are no longer fit for purpose and do not meet the housing need of Home Group customers. Home Group in a Joint Venture with Hill has undertaken pre-application advice discussions with both LBB and the GLA in relation to the future regeneration of the site. These pre-application discussions have been positively received by both LBB and the GLA. In accordance with the Mayor's Estate Regeneration policies, a successful residents ballot was held in May 2019 where 90.5% of eligible residents participated and 75.4% voted in favour of the regeneration. This demonstrated that an overwhelming majority of residents are in favour of the regeneration of the estate. Following the outcome of the Ballot, pre-application discussions continue to progress with LBB and the GLA, with the intention of submitting a planning application later in 2020. Home Group is supportive of the principles and objectives of the draft Local Plan as a whole, which look to meet the future needs for new homes, jobs and infrastructure. The Douglas Bader Estate falls within the Colindale Growth Area, which is covered by draft policy GSS06. The draft policy notes that the Colindale Growth Area has capacity to deliver 4,200 new homes between 2021 and 2036 (excluding the homes to be created through the regeneration of the Grahame Park Estate which is covered by draft policy GSS10). As highlighted through pre-application discussions with LBB, the Douglas Bader Park Estate has the potential to deliver circa 750 homes. This represents an uplift of circa 478 new homes which equates to 11% of the 4,200 minimum total homes expected to be provided within the Colindale Growth area as set out in the draft policy. We propose that an addition is made to the draft policy to reference the future regeneration of Douglas Bader Park Estate given the significant contribution it will make to the targets set out in the draft policy. Proposed amended wording to reflect this change is enclosed at <b>Appendix I</b> as tracked changes. As set out above, residents of the estate voted overwhelmingly in favour of its regeneration to provide new, high quality homes for the future. The principle of regeneration is also supported by both LBB and the GLA as demonstrated through pre-application discussions. Accordingly, to reflect this support and the significant provision of new homes that the regeneration of the Douglas Bader Park Estate will provide it is suggested that a site allocation should be introduced within the draft plan. On this basis, a suggested draft site allocation is enclosed at <b>Appendix II</b> which reflects the pre-application discussions held between Home Group, Hill and LBB to date.		
HADAS	Site 11	KFC/Burger King Add: CDH08 Add: This large development site should be the subject of an archaeological assessment.	Agreed	Yes
Historic England	Site 11	The development of this site has the potential to impact upon the Roe Green Village Conservation Area to the east, and the Buck Lane Conservation Area to the south both of which lie in neighbour Brent. Tall buildings have a much wider impact that needs to be considered. The Watling Estate Conservation to the north, within Barnet, should also be specifically mentioned in the policy as the development also has the potential to impact upon its setting. Careful design and massing could minimise or mitigate impacts. Again, the Character Appraisals for these conservations areas should form part of the evidence base, and where key views are identified in the appraisals they should be specifically mentioned so that it is clear to applicants and decision makers what parts of the site will have the highest heritage sensitivities.	Agreed	Yes
Mayor of London	Site 11	Welcome optimising development on this site and the development of the car park	We welcome this support	No

LB Brent	Site 11 and Site 12	Given the significance of A5 Edgware Road as a movement corridor, it would be helpful if the policy provided greater clarity on the need for development to provide an active ground floor frontage along it. Early engagement with local Brent councillors is encouraged in any emerging development proposals. Initial Planning considerations – add: “Development should positively address the Edgware Road and provide an active ground floor frontage along its length.	Agreed. This will be reflected in our Statement of Common Ground	Yes
HADAS	Site 12	McDonalds Restaurant Add: CDH08 Add: This large development site should be the subject of an archaeological assessment.	Agreed.	Yes
Mayor of London	Site 12	Welcome optimising development on this site and the development of the car park. The re-provision of car parking should be minimised and not exceed the standards set out in the Intend to Publish London Plan	Whilst this support is welcomed. Our approach to redevelopment of car parking is set out and justified through GSS12	No
HADAS	Site 13	Add: CDH08 Add: This large development site should be the subject of an archaeological assessment.	Agreed.	Yes
Environment Agency	Site 13	Should acknowledge the part of the site close to the Silk Stream is also in Flood Zone 2 and 3b (functional floodplain, the zone comprising land where water has to flow or be stored in times of flood). If the site passes the Sequential Test for the Local Plan, a Level 2 SFRA needs to inform the planning considerations, specifically flood risk mitigation measures required. The sequential approach should be applied on site to ensure the more vulnerable uses are located in areas of lowest flood risk within the site. Should be a requirement for a minimum 10 metres (or wider) green buffer zone from the edge of the Silk Stream main river. Tall buildings should be located away from the Silk Stream River Corridor.	Agreed	yes
Environment Agency	Site 14	Reference that the majority of the site is within Flood Zone 2 and parts of the south within Flood Zone 3b along the Silk Stream River Corridor. Indicate the site is located within 1 kilometre of the Brent Reservoir SSSI. If the site passes the Sequential Test for the Local Plan, a Level 2 SFRA needs to inform the planning considerations for this site, specifically flood risk mitigation measures required. The sequential approach should be applied to ensure the more vulnerable uses are located in areas of lowest flood risk within the site. There should be a requirement for a minimum 10 metres (or wider) green buffer zone from the edge of the Silk Stream main river. Tall buildings should be located away from the Silk Stream River Corridor to avoid shading and lighting impacts. Proposals should also avoid harm to the Brent Reservoir SSSI.	The Council has resolved to grant planning permission for this site (planning ref: 19/4661/FUL). The assessment provided in support of the application concluded that for fluvial risk for up to the 1 in 100-year flood event the existing flood defences would be sufficient, according to flood modelling completed by the EA. The assessment of existing surface water flood risk at the site is generally very low, although with some areas of higher risk – this will be managed through a surface water drainage strategy incorporating SuDS.	Yes
Canal & River Trust	Site 14	Likely to have significant impact on adjacent section of Silk Stream, which feeds into the stretch that the Trust owns and manages, between the A5 road and the Brent Reservoir itself. Support the requirement for the site development to avoid harm to the adjacent SINC, and include improvements to Silk Stream River Corridor.	Update with reference to planning consent	Yes
Mayor of London	Site 14	Welcome optimising development on this site and the development of the car park.	Whilst this support is welcomed. Our approach to redevelopment of car parking is set out and justified through GSS12	No
Natural England	Site 14 & 63	given their location adjacent to the SSSI, should ensure appropriate SuDS measures within the developments. They should also ensure there is no inappropriate access from the developments onto sections of the SSSI that are not formal paths/ recreation areas.	Site 14 has been revised as it is adjacent to the SSSI	Yes
Thames Water	Sites 1, 3,4,15 to 26,31 to 52, 54 to 60, 64 to 67	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	We welcome these comments from Thames Water	No
Theresa Villiers	Site 15	Already a proposal to develop 204 homes at Colney Hatch Lane so further 397 at Tesco site would be excessive increase in population in the area.	The timeframe for any development through this proposal is not expected in the early stages of the	No

			Plan. If the planning consent is implemented for the development at 231 Colney Hatch Lane, new residents will be well established before any development at Site 15. Contributions from development through S106 and CIL will help fund improvements to infrastructure and enable integration within this area.	
Environment Agency	Site 15	A small section along the southern boundary to west of the site adjacent to Pinkham Way, is within Flood Zone 2 and 3. In addition, the Bounds Green Brook runs underneath the site close the Pinkham Way in culvert and is designated main river. If the site passes the Sequential Test for the Local Plan, it would be advisable to include this site within the Level 2 SFRA, to assess the detailed nature of the flood risks and the impact from climate change. The site requirements should include consideration of de-culverting of the Bounds Green Brook and inclusion of an appropriate buffer zone either side of the main river. Under no circumstances should built development be allowed on top of the culvert, and access should be maintained along the entire length.	Agreed	yes
Mayor of London	Site 15	Welcome optimising development on this site and the development of the car park. The re-provision of car parking should be minimised and not exceed the standards set out in the Intend to Publish London Plan	Whilst this support is welcomed. Our approach to redevelopment of car parking is set out and justified through GSS12	No
Mayor of London	Site 17	Barnet should ensure there is sufficient educational capacity in the area and that this site is no longer required for education use. Barnet should ensure there is sufficient open space and outdoor recreational facilities in the area before the redevelopment of this site	This site has now been removed	Yes
Chassay+Last Architects	Site 17	Concerns that 148 units is unrealistic for this site and asks if there is a confusion between 'units' and 'habitable rooms' and states that the end of Park Road is a leafy road of generally 2 storey houses and bungalows with large front and rear gardens.	This site has now been removed	Yes
East Barnet Residents' Association	Site 17	This is not acceptable: Building on this open space is contrary to Policy ECC04.	This site has now been removed	Yes
CPRE	Site 17	We support the retention of this green space, which should be used for community and public use and to prevent further disuse of the green space.	This site has now been removed	Yes
East Barnet Residents' Association	Site 18	May be acceptable if community use is retained as described.	Agreed	No
Elizabeth Silver	Site 18	Change to be made: No residential capacity. Facilities retained. Lack of library facilities hinders social mobility as lower income groups increasingly do not have space to store books, nor money to buy them, thus impacting on the next generation's future earnings	Library has been re-provided in New Barnet Leisure Centre	No
Mayor of London	Site 18	Welcome the requirement to replace the community use, where there is demand	We welcome this support	No
East Barnet Residents' Association	Site 2	Update to 1,350 units following the developers winning the appeal. It is contrary to many of the Local Plan policies	Agreed	.Yes
Cromer Homes	Site 2	With reference to draft Policy CDH04 the approved scheme would be defined as comprising tall buildings (8-14 storeys) and it is confirmed in the assessment of the site (Site 2) that tall buildings are appropriate in this location. This is reiterated in draft Policy CDH04 which identifies some 9 locations where tall buildings are considered to be acceptable, this includes 'New Southgate Opportunity Area' (NSOA) (Policy GSS09). In the light of the decision to approve buildings in excess of 8 storeys, the site should be confirmed as being located within the NSOA and suitable for tall buildings. There should be a corresponding change to Site No.2 to increase the residential capacity that the site can accommodate, which would be reflective of the site's location within an Opportunity Area. The site is capable of	While the NSOA boundary has not been defined, the Council does not consider the outcome of the appeal decision as providing direction for drawing such a boundary, or as grounds for this site to be included as a location suitable for tall buildings. Schedule revised to reflect the appeal decision and reference 1,350 units. The site schedule should not support a higher	Yes.

		accommodating a greater quantum of residential development within the range for tall buildings (up to 14 storeys). The site could accommodate an uplift in residential units, which would be reflective of its location within an Opportunity Area and already being considered as suitable for tall buildings. The site description for site No.2 should be revised to reflect its capacity to accommodate a greater quantum of residential development. The indicative residential capacity should be described as: <b><u>At least 1,350.</u></b>	indicative figure, in particular one based on higher building designs.	
Mayor of London	Site 20	Welcome the re-provision of the community facilities	The Council welcomes this support	No
St William Homes LLP	Site 21	Supports principle of residential uses for Site Allocation 21 'New Barnet Gasholder'. In line with the Mayor's design led approach and for sites to be optimised, the allocation should replace the word 'indicative' with 'minimum of'. The inclusion of '10% community uses' is too onerous and is not based on evidence; to enable flexibility when the site comes forward, the Site Allocation should state that a small element of non-residential uses could be considered.	Proposal revised. The community uses are to address the potential needs of new residents in a large scheme, for example a creche.	No
Mayor of London	Site 21	This site is a non-designated industrial site, but is allocated as Opportunity Site 1 in the New Barnet Town Centre Framework 2010	Proposal reflects National Grid's intention to bring forward the redevelopment of this remaining part of the gas works	No
National Grid Property	Site 21	We wish to confirm that it remains our client's intention to bring forward the redevelopment of this remaining part of the gas works and that the current development programme is likely to bring development forward slightly in advance of the timeframe set out in the local plan. Whilst the precise number of dwellings will need to be confirmed through a detailed architectural feasibility assessment, we consider that the 190 units proposed provides a reasonable estimate of the site's development capacity.	The Council welcomes this support	No
Mayor of London	Site 22	Welcome optimising development on this site and the development of the car park. The re-provision of car parking should be minimised and not exceed the standards set out in the Intend to Publish London Plan	Whilst this support is welcomed. Our approach to redevelopment of car parking is set out and justified through GSS12	No
HADAS	Site 23	This large development site should be the subject of an archaeological assessment.	Agreed	Yes
Historic England	Site 23	While we welcome the provision of the policy to protect the setting of the listed building we advise that the policy should be more detailed. We recommend that both listed structures are identified within the policy. The listed buildings and general character of the area is sensitive to increases in building heights above the established levels and so we recommend that the policy specifies this, the rear of the site is likely to have the lowest heritage and townscape sensitivities. The policy should explicitly require the listed buildings to be retained. <i>(more detail is provided in the response)</i> There is some concern that the site capacity of 25 units could not be achieved on the site without causing harm to the setting of the listed building.	Agreed	Yes
Mayor of London	Site 23	Welcome the retention of the community use	The Council welcomes this support for re-provision of community facilities	No
Historic England	Site 24	<i>Detailed description of historic features of station provided in response.</i> Given this, the development will need to be carefully planned to ensure that the arrival to and entrance of the station is not obscured or impacted upon. This part of the site is likely to be the most sensitive and perhaps the policy should specify mitigation measures such as requiring this part of the site to be landscaped or kept open. The separate residential access along Diploma Avenue to keep the station entrance approach could be helpful in securing this heritage mitigation. The policy considerations could be expanded upon to make this point. There may be opportunities to secure heritage benefits to the historic fabric of the station via the development of this site e.g. concrete repairs, or signage. We note that the Tall Buildings Update (2019) identifies East Finchley as a low rise area with a village type character which does not lend itself to greater intensification via tall building height. We request that this is specified in the policy as specific planning consideration in relation to Site 24.	Height context added as part of the planning description	Yes
Lindsay Wittenberg	Site 24	I wish to strongly oppose the proposed change of use from public car parking to residential-led with 30% retail and public car parking. The car parking currently available at East Finchley station is the only	The site lies partly within, and partly adjoining, East Finchley Town Centre and is highly accessible by	Yes

		public car park in East Finchley, serving a broad and extensive clientele, including commuters who depend on the car park for their livelihoods. Even now the car park is not adequate to the demands placed upon it - and 30% retail and public car parking would reduce the available car parking to a fraction of what it now is. We most certainly do not require any more retail outlets in East Finchley as the High Road is more than adequate. The proposed development across the road from the station offers a significant challenge to car parking, besides which the low rise nature of East Finchley buildings currently maintains its distinctive character. It is critical for the amenities, wellbeing and character of East Finchley that the public car park as it now stands remains exactly as it is.	public transport. It is therefore appropriate to promote sustainable development that serves the town centre and promotes housing delivery. This includes ensuring that in considering any proposal for development public car parking requirements must be assessed and re-provided as needed.	
TfL CD	Site 24	Development timeframe could be brought forward to 5-10 years, or possibly within the next five years, subject to feasibility and viability. seeking assurance that the Council would not prevent proposals coming forward within a shorter timescale. It is not clear whether the "30% retail and public car parking" refers to site area or floorspace and this should be clarified. TfL is unlikely to come forward with a scheme that provides significant car parking in this highly accessible location (except for provision for people with disabilities); therefore, we suggest amending as follows: " <i>Proposed use type/s: residential-led with 30% retail <b>to enhance the town centre</b> and public car parking <b>for people with disabilities only</b></i> "	Proposal revised	Yes
Combined Finchley LLP	Site 25	The draft allocation refers to residential use only, however it occurs to us that because of the centre's organic 'high street' arrangement, there are few if any site opportunities for development to significantly enhance the centre's vitality and viability. The Council will acknowledge that the draft Spatial Strategy for Barnet (Policy BSS01) seeks up to deliver an additional 67,000m <sup>2</sup> of office space and 110,000m <sup>2</sup> of retail space across the borough's town centres over the plan period. The site could assist in meeting this requirement through an element of non-residential uses, given that it is on the edge of East Finchley District Town Centre, less than 100m from the Underground Station, and forms part of a small cluster of non-residential uses on the north side of the Great North Road, south of the railway line. Therefore we suggest that the 'Proposed use type/s' entry is modified to: " <i>residential and/or main town centre uses</i> ".	East Finchley Substation site is outside East Finchley town centre therefore the Local Plan does not promote main town centre uses at this site. It is acknowledged that the site has constraints in terms of noise and vibration from the adjacent Northern Line. These can be mitigated by a well designed residential scheme in a location within 100m of East Finchley Station. There is potential for a small element of office space as the commercial use, subject to the sequential test	Yes
Combined Finchley LLP	Site 25	Exploration of Building Retention Potential: We understand that TfL have given this principle further consideration since the 'Call for Sites' entry. Whilst the substation function has long since ceased, the building continues to act as the retaining structure for this part of the railway embankment. However we understand that this is becoming increasingly impractical from a maintenance perspective. Consequently, a condition of the land sale will be that a new independent retaining wall is to be erected against the embankment with a three metre separation for maintenance access for TfL. Hence the loss of the majority of the existing building is inevitable, such that there would appear to be little point in seeking to retain what little may be left over (with the consequent structural implications), and hence the allocation should anticipate complete redevelopment of the site. Of course, any replacement building would continue to need to be respectful of the adjacent heritage assets.	See response above	Yes
TfL CD	Site 25	Suggest this housing allocation is widened to also include potential for commercial uses, particularly at ground floor level which, due to site topography (the embankment behind) may not be best suited to housing. Commercial use would also accord with the garage and office buildings adjacent and enhance the town centre. The existing structure does not lend itself to residential conversion or the density of development which is sought. Therefore, suggest this is deleted from the allocation as it is likely to be unfeasible.	See response above	Yes

HADAS	Site 26	Add: This large development site abuts a proposed new APA and should be the subject of an archaeological assessment.	Agreed	Yes
Michael McGrath	Site 26	I am concerned at the touting of the Park House site (N2) to developers with the potential for 42 flats and with 30% of the site given over to a community facility. This implies a very tall building which would have to be very close to neighbouring buildings. I note the plan shown in the document shows the Park House site includes the neighbouring site at 12-18 High Road for which planning consent has been granted for 24 flats and an office building. Was this deliberate or an error? I would also ask that the Council give some consideration to the impact of planning policies where the development site is within a designated town centre. In practice the rules regarding separation of buildings within the town centre are applied even though the neighbouring buildings are outside the town centre. This is grossly unfair and something that should be clarified in future iterations of the planning guidance.	Proposal revised	Yes
Mayor of London	Site 26	Welcome the requirement to replace the community use	The Council welcomes this support for re-provision of community facilities	No
HADAS	Site 27	Add: This large development site should be the subject of an archaeological assessment.	Agreed	Yes
Aberdeen Standard Investments	Site 27	The proposed uses are unnecessarily prescriptive and somewhat arbitrary. ASI request the text is amended as follow: " <del>residential with 25% retail, office, leisure and community</del> <b>an appropriate provision of town centre uses</b> " ASI capacity work identifies in excess of 2,500 residential units for The Broadwalk Centre alone. When combined with the Forumside site, Site 27 has the capacity to deliver considerably in excess of 2,379 new homes. A higher figure of a minimum of 3,500 residential units would more appropriately reflect the site potential.	Delivery of town centre uses are critical for this site. Specifying what these should include, along with a broad indication of the quantum of non-residential uses, is key to ensuring the ongoing vitality and viability of the town centre. Sites Schedule format updated to more accurately provide a indication of the potential mix of uses The number of units is indicative, and is based on site area, PTAL and context. Other town centre uses must also be delivered on this site and a higher figure as a minimum would therefore be inappropriate.	No
DN Capital Property Ltd	Site 27	Support proposed allocation and the indicated land uses in principle. Para127(e) of the NPPF, London Plan Policy 3.4 and draft London Plan Policy D3 all outline the importance of site optimisation through appropriate, contextually specific densities. Therefore reiterate the importance for the development potential of individual sites within the Growth Areas to be fully explored and the potential to be optimised. Railway Hotel itself should also be included within the Edgware Town Centre allocation. The site provides the opportunity to deliver a significant quantum of residential development and desirable non-residential uses to improve the vitality of Edgware and enable the refurbishment and viable long term use of the Railway Hotel itself. The site is available for development in the short-term, and can be brought forward independently of the wider allocation. It is important that individual sites do not prejudice the redevelopment of the wider area but that policy allocations do not stop individual sites coming forward independently.	The Council welcomes these comments. The Local Plan supports density optimisation within the context of protecting amenity and heritage assets. This is consistent with NPPF and London Plan policy. The Council is entirely supportive of the refurbishment of the Railway Hotel but does not consider extending the site boundary to include it is necessary to ensure an appropriate outcome for this important heritage asset. The Council wants the Railway Hotel to be returned to a suitable use that preserves the Grade II listed building and ensures the use is appropriate to its heritage and community status.	Yes  -
TfL	Site 28	Bus operations and the function of the bus station should be protected or re-provided as part of any redevelopment	Agreed	Yes
Mayor of London	Site 28	Bus operations and the function of the bus station should be protected or re-provided as part of any redevelopment	Agreed	Yes
HADAS	Site 28	Add: This large development site should be the subject of an archaeological assessment.	Agreed	Yes
CPRE	Site 28	This site is adjacent to Deans Brook: any development should not encroach onto this green space.	The area around Deans Brook and the south eastern part of the site is classified as a Site of Borough Importance for Nature Conservation. Site 28	Yes

			guidelines have been updated to clarify that the SINC should preserved.	
Environment Agency	Site 28	Flood Zone 2 and 3 overlaps the north eastern boundary of the site in places. There is some surface water flood risk. If the site passes the Sequential Test for the Local Plan, advise including this site within the Level 2 SFRA to assess the detailed nature of the flood risks and the impact from climate change. The site requirements should include consideration of de-culverting of the Deans Brook and the inclusion of other river enhancements and an appropriate green buffer zone either side of the main river. No development should be allowed on top of the culvert and access should be maintained along the entire length.	Agreed	Yes
HADAS	Site 29	Add: CDH08 Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.	Agreed	Yes
CPRE	Site 29	This site is situated in the Green Belt. The site allocation document states the site is previously developed however it is clear that the site is a cleared hardstanding section of land and should not be classified as 'previously developed'. Therefore, we object to further encroachment into the Green Belt on this site and do not support development here, in particular because paragraph 10.5.24 in the Regulation 18 document states that the Barnet Green Belt and Metropolitan Open Land Study has found that all existing areas of Barnet's Green Belt meets one or more purposes set out in the NPPF	Any future development proposals that come forward for this site will be considered in accordance with NPPF paragraph 133 to 147.	No
Mayor of London	Site 29	Welcome the continued waste use. The on-going operations should preserve the openness of the Green Belt and not harm the nature conservation sites near by	The Council welcomes this support.	No
Thames Water	Site 3	A critical trunk sewer runs through/close to this site which would need to be considered.	Proposal revised	Yes
Environment Agency	Site 3	Site description needs to include that the majority of the site is in Flood Zone 2. If the site passes the Sequential Test for the Local Plan, a Level 2 SFRA needs to inform the planning considerations for this site, specifically flood risk mitigation measures required. Include a requirement for a 10m green buffer zone from the edge of the Pymmes Brook to the development, and consideration of river enhancement measures.	Agreed	Yes
Mayor of London	Site 3	Welcome the requirement to replace the community halls, where there is demand. Welcome requirement that MOL is not developed	The Council welcomes this support for re-provision of community facilities	No
East Barnet Residents' Association	Site 3	May be acceptable if the parking, access and community use are retained as stated.	The Council welcomes these comments	No
CCI London Community Church	Site 3	Barnet's Local Plan is disproportionate as it appears not to take into account the best interest for the current residents and local area and the disruption that it will create for the community if the Old Veterans Hall is demolished to give way for new developments to be built in that same space that is currently being used thoroughly by the Barnet residents and that benefits the community greatly as is where the CCI London has been established for the past 12 years, giving the community an inclusive Christian Church that has been supporting the local community and where people can belong, contribute and thrive. Part of the things we will lose as a community if the local plan goes ahead (as it is currently stipulated to demolishes the Old Veterans Hall), CCI will force to stop serving nearly 250 people on a weekly basis, that is approximately 100 households and families mostly from Barnet that will no longer have this space that allows them to be part of a long standing community that benefits the Barnet residents. We have regular meetings, gatherings and nearly every week we have a communal event. For the above reasons, we are making this formal representation to object the local plan with regards to the old veterans Hall located on Osidge Lane N14 5DU. We want the council to know that our community wants to do everything possible to avoid getting the site demolished. We also want for the council to see how relevant and important the old veterans Hall is for the community and the work that CCI London has done for the residents of Barnet from these premises. At this moment we believe that Barnet's local plan is not taking into account the impact of their decision on the local residents and	The Local Plan supports re-provision of a community use if this site is subject to re-development. The Council as landowner will work with existing occupiers to ensure they find new accommodation either within the redeveloped site or an alternative location in a town centre which is more capable of serving local catchment needs by sustainable travel modes.	No

		everyone else that belongs to CCI community will have , if the Old Veterans Hall is demolished , What is more we need to make sure that Barnet council understands the importance of the work done in this particular site.		
Theresa Villiers	Site 3	Existing building on this site should be retained for use by the Community Church.	The Local Plan supports the re-provision of a community use if this site is subject to re-development. The Council as landowner will work with existing occupiers to ensure they find new accommodation either within the redeveloped site or an alternative more sustainable location such as a town centre within Barnet.	No
CCI London Community Church	Site 3	Osidge Lane, Community Halls – current use – non-residential uses. Evidence to be provided that the community halls are no longer required – the community halls are used daily with additional occupation during the weekends and the ‘Scouts hut’ now also being used too. Council assets disposal programme – the site is not for disposal as it is in constant use, and in need to extension due to the increased use as a key community hub with various events being hosted and opened to the wider community. ‘Proposes use type/s:’ to be further elaborated upon and explained how the area can be reduced to 75% community use and how this impact and will be impacted upon by the proposed residents as well as the developers. With consideration of the environment and climate change – how will the increase of resident’s impact on the local park and water way, as well as strain on the current levels of parking. What considerations have been taken to properly reallocate any current residents and lease holders of the current community halls?	This site has been put forward as part of the Council’s Assets Disposals Programme and Site 3 as set out in the Local Plan. The Council will work with existing occupiers to either accommodate in new development or help find suitable premises elsewhere. There are no existing residents on Site 3	Yes
HADAS	Site 30	Add: Part of the site lies within an Archaeological Priority Area (APA) and will require assessment.	Amend	Yes
Taylor Wimpey and TfL	Site 30	The proposed 50% non-residential uses do not reflect the emerging development proposal and methodology behind this statistic is unclear. The emerging proposals include an appropriate mix of uses and level of commercial space which has been informed by extensive pre-application discussions with the Council and need to complement the surrounding town centre. It is not appropriate for 50% of the proposal to be non-residential uses; this is unviable and require substantial amounts of non-residential uses on the upper floors of the scheme. It would significantly reduce residential capacity (including affordable homes). It is not possible to provide the stated 556 new homes and meet the 50% non-residential uses target without substantially increasing the proposed massing of the scheme. Request the next iteration of the site allocation omits reference to a percentage of non-residential uses and instead states that consideration should be given to providing non-residential uses at ground floor to help activate the scheme. Further flexibility should be included within the allocation with estimated capacity increased to c.600 homes This is an accessible brownfield sites and is adjacent to an existing transport hub within the town centre. This is the type of site which the Barnet Growth Strategy (2019) envisions coming forward to optimise housing development. The draft Local Plan defines tall buildings as 8 or more storeys. Any redevelopment scheme that fails to include a tall building of 8+ storeys would fail to make best use of this valuable brownfield land and would not comply will draft London Plan policy D3 (optimising site capacity through the design-led approach). Request that the Site Allocation is more positively worded and is amended as follows: “ <b><u>tall buildings are appropriate within the site allocation and ‘very tall’ buildings may also be suitable, subject to a detailed townscape and visual impact assessment and meeting the criteria set in draft policy CDH04.</u></b> ” Should be seeking to reduce and remove car parking within the Borough as part of a response to the Climate Emergency and need to create healthy streets. The wording should be amended so that it reflects this objective and positively supports a reduction. An amendment is requested as follows: “ <b><u>the loss of public car parking spaces as part of the redevelopment is supported where the proposal improves sustainable modes of transport and has helped mitigated adverse impacts.</u></b> ” The site plan for the emerging	The 50% includes those parts of the site retained for other uses including a significant portion being for ongoing transport use such as the tracks and station. The elements of office and retail in the proposed scheme will therefore form a much smaller proportion of the overall quantum of development. The Sites Schedule format has been updated to more appropriately describe the potential mix of uses.  Proposed higher figures would need to be justified on design.  The wording reflects that, while tall buildings may be appropriate in Finchley Central, proposals must demonstrate they meet the required criteria. The site itself is lengthy and varies considerably in character and context; tall buildings would therefore not be appropriate in all parts of the site.  The Local Plan supports and encourages sustainable modes of transport while recognising that some car parking may continue to be required. The Council’s approach requires reductions in car parking to be justified.	Yes



		development proposal has been amended since the 'Call for Sites' consultation in 2019. TW/TfL request that the draft site allocation boundary is updated accordingly.		
Caroline Thomas and Bob Ganly	Site 30	The proposals for Finchley Central, with its loss of commuter car parking spaces will make it very difficult for people in the area who work in Central London to drive to the station. The area needs more rather than less car park space. The plan will also add to congestion in the vicinity	The Council wants to reduce car usage and make more efficient use of land used for surface level car parking.. People living in the area should not be driving to the station when other more sustainable choices are available. The Council wants to reduce car usage.	No
TfL CD	Site 30	Feasibility work to suggests residential capacity of 556 should be achievable. However, to optimise housing delivery suggest this figure is raised to 600 Suggest the reference to "50% mixed uses" is removed from the allocation as it would not be achievable in terms of floorspace. References to car parking and office floor space should be deleted: " <del>Proposed use type/s: residential-led with 50% mixed uses (transport and town centre uses to strengthen the high street including retail, and food and beverage, and public realm / open space. , retail, offices, car parking)</del> " TfL intends to retain the southern end of the existing car park for operational purposes along with land located to the north of the line to Mill Hill and the south west of the line to High Barnet. The boundary should therefore be revised. The allocation should clarify that the site is suitable for tall and very tall building/s. This would accord with draft NLP and Barnet planning policies and the town centre. Description of surrounding context should also refer to other nearby taller buildings on the high street including the Travelodge hotel (six / seven storeys) and Gateway House (eight storeys). The existing station building has been locally listed and TfL has no plans to redevelop the station buildings which provide 'step free access' to the platforms and adequate capacity. Agree that development proposals should consider how it can support improved access the station and increase its presence on the high street. Suggest rewording: " <del>Comprehensive residential led development with a new station interchange and improved access to the station from Regent's Park Road and -Development should enhanced</del> visual and functional connection between station and town centre." Modify car parking references: " <del>For any loss of car parking spaces an assessment must be undertaken and mitigation provided to encourage the use of public transport and active modes of travel. replacement spaces may be required.</del> " Reduce the development timeframe to 0-5 years - aim to have planning permission in place to commence development by March 2021. The programme for delivery of the whole site is likely to be approximately seven years.	In addition to the response above to Taylor Wimpey. Site description updated to reference other significant buildings on Ballards Lane and that the station building is locally listed and should be retained. Also reference added to step free access and proposals improving access to the station and its presence on the high street. The Local Plan supports and encourages sustainable modes of transport while recognising that some car parking may continue to be required. The Council's approach requires reductions in car parking to be justified.  The timeframe shows when the scheme is expected to be completed. As such, a seven year build out places the scheme within the 5-10 year timeframe.	Yes
Finchley Society	Site 30	The development of the land around Finchley Central Station is currently the subject of consultation. The Finchley Society's views are being made known through that process. The emphasis of the "Initial planning considerations" in the Draft Plan is generally welcome. We view as positive: (a) the linking of the visual and functional connection between station and town centre, (b) the retention of a continuous active and attractive frontage along the main road, (c) provision of flexible workspaces and use by SMEs, (d) restrictions on the design due to its proximity to the Finchley Church End Conservation Area, (e) the need to respond to the 'Finchley vernacular' style of surrounding buildings (which is done by existing developments such as Gateway House which includes the Finchley Church End Library). We disagree that Finchley Central is an appropriate location for tall buildings of over 8 storeys (despite the existence of the 9-storey Central House). This is a narrow segment of roadway, and even narrower pavements. Development of tall buildings on either side would create a canyon effect with unacceptable lack of light and views at street level. It is an area of established architectural character, and of a significant number of recent developments in the 5-7 storey range that set a good precedent. The town centre should be developed on the basis that the maximum acceptable height is 8 storeys. The commercial and housing aims of the development can be achieved by careful apportionment of the 8 storey maximum across the whole site.	We welcome support for the initial planning considerations.  Finchley Central town centre was identified in the 2012 Local Plan as a location where tall buildings may be supported	No

Thames Water	Sites 24, 26, 31, 35 to 42	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	We welcome these comments from Thames Water	No
HADAS	Site 31	Add: CDH08 Add: This site abuts an APA and as a major site should be subject to an archaeological assessment.	Agreed	Yes
TfL CD	Site 31	Previous use of the site was residential; houses were acquired by DfT for a road widening scheme that was never brought forward. TfL had to demolish most of the homes on the site after they were vandalised and became unsafe. A synagogue occupies the two remaining houses on a short lease as a 'meanwhile use' prior to the site being comprehensively redeveloped. TfL initial feasibility work indicates site capacity for a minimum of 50 new homes and the indicative residential capacity should therefore be raised. This site could be developed within a five-year timeframe and the Development timeframe should be amended to reflect this.	There are significant constraints in terms of mitigating noise and air pollution from the adjacent A406 road. Access is also a major constraint, including for public transport, private cars, and delivery of essential services. Raising the indicative residential capacity is therefore not considered to be appropriate. Timeframe revised	Yes
Catherine Oliver	Site 32	I am e-mailing as a resident of manor park road to object to this plan we already have significant difficulty parking on our road without extra houses and less parking!	The requirement to undertake an assessment of car parking needs and provide replacement spaces as required is a planning consideration for the site.	No
Stuart Thomson	Site 32	We wish to object in the strongest possible terms to one of the changes in use proposed in Site 32. This site is not suitable for housing as is proposed. The site is currently used predominantly as a much needed car park for local residents. The site was, according to long term residents, made a car park when the middle section of Manor Park Road was pedestrianised to prevent 'rat running'. These spaces were allocated to those residents who lost the spaces on the pedestrianised area. Parking in the area is already a problem especially when there are events taking place at the Bishop Douglass school. To remove the current spaces (approx 14) and then to add at least 7 extra cars to the numbers looking for spaces would be too much of a burden on Manor Park Road, Hamilton Road and Brackenbury Road. That will make an extra approx 21 vehicles seeking spaces on already crowded roads. No assessment has been made regarding the impact on parking or on traffic flows around these three roads. Sadly, Barnet Council has long neglected maintenance of the carpark and the small park at the back of the carpark. There is some anti-social behaviour that takes place in the park which has caused some residents distress. However, that should not be viewed as reason enough for the Council to seek a change of use. Instead, the area should be properly maintained by the Council. One could suggest that it has been deliberately rundown to act as an excuse to justify the proposed change of use. Furthermore there are significant flaws in the way in which Barnet Council has undertaken this consultation: 1) Not all affected residents received the consultee letters (Dated Jan 2020) 2) It was incredibly difficult to find the proposal from the information detailed in the letter and took lots of clicking on links and scrolling. (the Planning Consultation page and Engage Barnet sites were given but it was not straightforward to find the details from those pages.) 2) If you did actually manage to find the proposal, the car park was listed as being in the Golders Green ward - this is false, it is in the East Finchley ward. This 'hides' the information making it difficult for affected local residents to know that a change is even being proposed.	The requirement to undertake an assessment of car parking needs and provide replacement spaces as required is a planning consideration for the site.  The consultation letters relating to the 'Schedule of Site Proposals' were sent to those addresses within 100m of the sites.  The list of sites table at 15.4 has been revised to reflect the correct ward for Site 32.	Yes
Matt and Geetha Beaven	Site 32	We would like to object to the changes proposed in the above plan. The site is currently used predominantly as a car park for local residents. Changing it to housing would lead to the street being overloaded with cars – 14 spaces would disappear, while new residents would put additional strain on parking spaces.	The requirement to undertake an assessment of car parking needs and provide replacement spaces as required is a planning consideration for the site.	Yes

		The site was originally made a car park when the middle section of Manor Park Road was pedestrianised to prevent traffic short cutting through the street. Parking in the area is already a problem especially when there are events taking place at the Bishop Douglass school, and with an increasing number of its pupils driving cars and parking in the residential area. There seems to be no apparent assessment or regard for the impact on parking or on traffic around Hamilton Road, Brackenbury Road and Manor Park Road. We live directly opposite the car park. Behind it is a very small park which – if properly maintained by Barnet Council – would provide a great outlet for the many young children in the street and a much needed spot of green space in a very built up area. I've not seen any maintenance here in the last few years. Perhaps it has been deliberately run down to assist the proposed change of use? I should also point out that the we never received the consultee letter and it was almost impossible to find the proposal in the report as it was filed in the wrong place – (it was listed in the Golders Green ward instead of East Finchley). Again, have things been deliberately hidden?	The consultation letters relating to the 'Schedule of Site Proposals' were sent to those addresses within 100m of the sites.  The list of sites table at 15.4 has been revised to reflect the correct ward for Site 32.	
Sylvie Clarke	Site 32	I would like to object to the proposal to build housing on our car park area. Our area is congested enough without losing those spaces and adding yet more cars. Those car spaces were a vital part of the plan, a prerequisite, when the pedestrian area was paved over. We need space to park and the green area to provide oxygen and to nurture wildlife.	The requirement to undertake an assessment of car parking needs and provide replacement spaces as required is a planning consideration for the site.	No
Mayor of London	Site 32	Welcome the redevelopment of the car park	Whilst this support is welcomed. Our approach to redevelopment of car parking is set out and justified through GSS12	No
Langley Park Residents' Association	Site 33	No indication how the footprint, placement and height of any building is calculated. Concerned that a building on the car park could seem overbearing when viewed from Langley Park and that many properties would suffer from loss of natural light. Properties at the top end of the road could also be overlooked. Air and noise pollution should be an important factor for locating any residential dwelling so close to motorways, roads and railway. Langley Park has a lack of parking spaces in the road due to the proximity to both the town centre and the railway station. A plan is needed to avoid Langley Park being used as an overflow car park for any development; e.g. modification to the current CPZ such as having a one hour restriction both in the morning and afternoon. Note that the Bunns Lane car park is not just for those using the station but it also serves for those who want to make use of the facilities in Mill Hill Broadway Town Centre - in previous documentation Bunns Lane car park is referred to as the Shoppers' Car Park. Loss of car parking could be detrimental to the Town Centre. Suggest a change to the site description as follows: <i>Comprising the car park (184 spaces) for Mill Hill Broadway Station <b>and the Town Centre. The car park is also used when Saracens are playing at home.</b> The site is immediately adjacent to the Midland Main Railway on the eastern boundary, with the raised M1 carriageway immediately beyond. Mill Hill Broadway town centre is immediately to the east <del>to the east</del>. To the west is low-rise housing.</i> There is an entrance to the station from the car park. Loss of such an entrance would be inconvenient for those pedestrians approaching the station from Bunns Lane either by foot or from the car park. Council failure to provide adequate and timely infrastructure and services to support new dwellings.	Further detail on massing has to be established through the planning application process. The impact on the amenity of neighbouring properties will be assessed and consultation carried out. Proposals must ensure noise and air pollution are avoided or mitigated. Public transport access in the area reduces the need for cars to use the station and local centre and the Local Plan supports more sustainable transport modes to reduce car use. Further consideration and enforcement of CPZs can be used to control on-road parking. Reference added to use of the car park for the town centre and for the Saracens matches and for development proposals seeking to maintain the access point to the Station. Chapter 12 of the Local Plan sets out how contributions from development can help fund infrastructure to support growth.	Yes
Caroline Thomas and Bob Ganly	Site 33	Again there is a need for more rather than less car parking capacity in the area, rather than less.	Increasing car parking spaces is not sustainable and not supported by the Council.	No
Roger Tichborne	Site 33	Effects of loss of parking provision on local roads, given the commuting patterns from Mill Hill Broadway. Inadequate parking provision for existing residents means any loss of parking is likely to cause additional problems. Barnet council admitted that the car park is now viewed as ancillary to the Station rather than as a necessary support for parking for the shops at Mill Hill. The logic for a hotel on the site is flawed. Unlikely that people using the hotel to visit central London will add much to the Mill Hill economy. There is already a very large hotel in Mill Hill at Scratchwoods Service Station. Would prefer	Public transport access in the area reduces the need for cars to use the station and local centre. Local Plan supports more sustainable transport modes to reduce car use. Controlled Parking Zones (CPZs) can be established and enforced by the Council to control on-road parking. The Council considers that a hotel could be a suitable use at this location, subject to the	No

		to see the access road opened up, with the restrictions for access to the M1 as a ratrun, moved elsewhere, so residents with visiting relatives can use the hotel easily.	specific proposal, and would benefit the local economy. The Scratchwood Services hotel and access road are distant from the site, being located approximately 2km away. Any changes to road access will be a matter for consideration by the Highways Department.	
Former MHNF	Site 33	With regards to 7.7.1 we agree that (see Site 33) a hotel with active frontages at ground floor level should be built on the Council owned car park off Bunns Lane at Mill Hill Broadway Station. A hotel together with the other facilities should be included in a viable scheme. The scheme should include a multi-storey car park (with a capacity for 500 cars and 250 cycles), which could convert partially to offices or residential if parking requirements reduce over time. A cinema, a Public House (strangely there is not one in our Town Centre), well sized retail units or offices and some residential units on top, would be a real game changer for the future of our Town Centre. It would attract visitors who would be pleased to stay in a decent hotel within a 20 minute ride from Central London, and one they could easily approach from the M1, M25 & A1. The Thameslink line could further attract people from Borehamwood, St. Albans, Hendon and Cricklewood to these new offerings. We fully support this development and looking forward to seeing it brought forward.	We welcome this support. However increasing car parking spaces is not supported by the Council.	No
Mayor of London	Site 33	Welcome the redevelopment of the car park. The re-provision of car parking should be minimised and not exceed the standards set out in the Intend to Publish London Plan	Whilst this support is welcomed. Our approach to redevelopment of car parking is set out and justified through GSS12	No
HADAS	Site 34	Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.	Agreed	Yes
Historic England	Site 34	There's a substantial amount of archaeological evidence within the surrounding area for both Roman and Medieval settlement. Although this site is not allocated for intense development we advise that the policy specifies the potential presence of archaeological remains and the submission of a desk based assessment upon application.	Agreed	Yes
Mayor of London	Site 34	Welcome the redevelopment of the car park	Whilst this support is welcomed. Our approach to redevelopment of car parking is set out and justified through GSS12	No
HADAS	Site 35	Add: This site abuts an APA and as a major site should be subject to an archaeological assessment.	Agreed	Yes
LB Barnet Estates	Site 35	Capacity is identified as "23 (student halls of residence)". It states that "Accommodation will be in the form of student halls of residence – the indicative capacity shown is on the ratio of three student rooms to one conventional unit of accommodation". It is assumed that this means that the student room capacity is therefore 69 (23 x 3). For clarity, the student room capacity should be stated explicitly in the "Development residential capacity" section.	Number of indicative student units has been clarified.	Yes
Middlesex University	Site 35	It is assumed that this means that the student room capacity is therefore 69 (23 x 3). For clarity, the student room capacity should be stated explicitly in the "Development residential capacity" section.	Number of indicative student units has been clarified.	Yes
Mayor of London	Site 35	Welcome the redevelopment of the car park	Whilst this support is welcomed. Our approach to redevelopment of car parking is set out and justified through GSS12	No
HADAS	Site 36	Add: This site abuts an APA and as a major site should be subject to an archaeological assessment.	Agreed	Yes
LB Barnet Estates	Site 36	Capacity is identified as "60 (student halls of residence)". It states that "Accommodation will be in the form of student halls of residence – the indicative capacity shown is on the ratio of three student rooms to one conventional unit of accommodation". It is assumed that this means that the student room capacity is therefore 180 (60 x 3). For clarity, the student room capacity should be stated explicitly in the "Development residential capacity" section.	Number of indicative student units has been clarified.	Yes
Middlesex University	Site 36	It is assumed that this means that the student room capacity is therefore 180 (60 x 3). For clarity, the student room capacity should be stated explicitly in the "Development residential capacity" section.	Number of indicative student units has been clarified.	Yes

HADAS	Site 37	Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.	Agreed	Yes
Middlesex University	Site 37	It is assumed that this means that the student room capacity is therefore 210 (70 x 3). For clarity, the student room capacity should be stated explicitly in the "Development residential capacity" section.	Number of indicative student units has been clarified.	Yes
Mayor of London	Site 37	Welcome the redevelopment of the car park. The re-provision of car parking should be minimised and not exceed the standards set out in the Intend to Publish London Plan	Whilst this support is welcomed. Our approach to redevelopment of car parking is set out and justified through GSS12	No
HADAS	Site 38	Add: This site abuts an APA and as a major site should be subject to an archaeological assessment.	Amend	Yes
LB Barnet Estates	Site 38	Capacity is identified as "84 (student halls of residence)". It states that "Accommodation will be in the form of student halls of residence – the indicative capacity shown is on the ratio of three student rooms to one conventional unit of accommodation". It is assumed that this means that the student room capacity is therefore 252 (84 x 3). For clarity, the student room capacity should be stated explicitly in the "Development residential capacity" section.	Number of indicative student units has been clarified.	Yes
Middlesex University	Site 38	It is assumed that this means that the student room capacity is therefore 252 (84 x 3). For clarity, the student room capacity should be stated explicitly in the "Development residential capacity" section.	Number of indicative student units has been clarified.	Yes
HADAS	Site 39	Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.	Agreed	Yes
Mike Kintish	Site 39	I have a lease on 17a The Burroughs which is adjacent to the car park. I am a record producer and my business is located in 17a The Burroughs precisely because it is quiet and I am able to record sound. The studio is sufficiently soundproofed that it is protected from sound from the car park and road but I have a major concern that extended building work and drilling on the car park would mean I could not work from my premises for the duration of the build, which I suspect would be over a year at least. I understand the need for housing so I just want to raise my concern as it would seriously impact my business. I also see how full the car park is every day for use by residents and business merit holders such as myself and parking would need to be considered in the application.	Construction noise and disruption should be minimised through good site management and operation and construction activities should be planned to limit both the level and duration of noise. The requirement to undertake an assessment of car parking needs and provide replacement spaces as required is a planning consideration for the site.	No
Historic England	Site 39	As with site 34, there has been a substantial amount of archaeological evidence within the surrounding area for both Roman and Medieval settlement, including a Roman tessellated floor and a Roman burial urn. The policy should make provision for the presence of archaeological potential.	Agreed	Yes
Mayor of London	Site 39	Welcome the redevelopment of the car park.	Whilst this support is welcomed. Our approach to redevelopment of car parking is set out and justified through GSS12	No
East Barnet Residents' Association	Site 4	May be acceptable if the parking is retained or replaced (this is not mentioned) and library and health centre are retained or replaced as described.	Parking will be provided in accordance with TRC03	No
Mayor of London	Site 4	Welcome the requirement to replace the community facilities	The Council welcomes this support for re-provision of community facilities	No
Elizabeth Silver	Site 4	Change to be made: No residential capacity. Facilities retained at full capacity. Lack of library facilities hinders social mobility as lower income groups increasingly do not have space to store books, nor money to buy them, thus impacting on the next generation's future earnings. Health Centre even more important to retain than ever, in the face of increasing population.	The proposal requires library and health re-provision. This will be funded from contributions from re-development of this Council owned site. It is in the interests of the Council to generate income from this asset as well as deliver much needed new homes.	No
HADAS	Site 40	Site 40 Meritage Centre Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.	Agreed	Yes
Middlesex University	Site 40	Assumed that this means that the student room capacity is therefore 108 (36 x 3). For clarity, the student room capacity should be stated explicitly in the "Development residential capacity" section.	Number of indicative student units has been clarified.	Yes
Historic England	Site 40	Site lies in a highly sensitive location. Current building adds little value to quality of area so there is scope for enhancement, however it is crucial that any new development remains low rise. Site falls within an archaeological priority area (APA) and adjacent to the medieval church and burial ground. There is	Agreed	Yes

		substantial archaeological evidence for Roman and medieval activity both within the site and in the surrounding areas.		
Mayor of London	Site 40	Welcome the requirement to replace the community use	The Council welcomes this support for re-provision of community facilities	No
HADAS	Site 41	Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.	Agreed	Yes
Middlesex University	Site 41	Assumed that this means that the student room capacity is therefore 48 (16 x 3). For clarity, the student room capacity should be stated explicitly in the "Development residential capacity" section.	Number of indicative student units has been clarified.	Yes
Historic England	Site 41	This site is located within an archaeological priority area and adjacent to the medieval church and burial ground. There is substantial archaeological evidence for Roman and medieval activity both within the site and in the surrounding areas.	Requirement added for a desk-based assessment upon application to reflect APA	Yes
Mayor of London	Site 41	Welcome the redevelopment of the car park. Welcome the requirement to replace the community use	The Council welcomes this support for re-provision of community facilities. Our approach to redevelopment of car parking is set out and justified through GSS12	No
HADAS	Site 42	Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.	Agreed	Yes
LB Barnet Estates	Site 42	Existing student halls of residence has an inefficient layout and has potential for optimisation to help meet demand for student bedspaces. In accordance with principles of LONDON PLAN Policy D3 'Optimising site capacity through the design-led approach' and subject discussions with the Council there is scope to redevelop the site to provide up to 567 student bedspaces. We therefore seek amendments to the wording to explicitly state that the student housing capacity of the site could indicatively accommodate up to 567 student rooms.	Number of indicative student units has been clarified.	Yes
Middlesex University	Site 42	Assumed that this means that the student room capacity is therefore 117 (39 x 3). For clarity, the student room capacity should be stated explicitly in the "Development residential capacity" section.	Number of indicative student units has been clarified.	Yes
HADAS	Site 43	Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.	Agreed	Yes
Barnet Society	Site 44	Generally support the building of some housing and upgrading of the public realm but fear that a great opportunity to reconfigure High Barnet as a transport modal interchange is being lost. Highly critical of the overbearing mass of 6-7 blocks proposed an have serious reservations about the loss of so many car parking places. Indicative residential capacity of 292 dwellings is over-optimistic.	Sites near stations are a focus for development at higher densities. This is supported by national and London Plan policy. An opportunity for improving High Barnet interchange. Height parameters have been added to the proposal	Yes
Theresa Villiers	Site 44	Strongly oppose plans to build over station car parks. -	Given the needs to deliver new homes and reduce dependency on the car there are good sustainable reasons to redevelop car parks. Surface level car parking is considered an inefficient use of land when PTAL is high but this has to be counterbalanced with the contribution that provision for car parking can make to town centres. The Council's requirements of proposals that seek the redevelopment of car parks is set out at GSS12. This includes a demonstration that capacity is available.	No
Taylor Wimpey and TfL	Site 44	25% 'non-residential' uses is unlikely to be appropriate in this location and it is unclear how this has been calculated. The site allocation should not refer to a specific target of non-residential uses, but instead state that consideration should be given to providing non-residential uses at ground floor to help activate the scheme. The emerging proposals for High Barnet only include a small proportion of non-residential uses, to protect Chipping Barnet town centre and provide a small amount of complementary uses by the Station. NPPF Paragraph 157 does not state that a prescribed quantum of development or exact mix of uses should be identified in the allocation, as it should promote the flexible use of land. The appropriate quantum and mix of development should be determined by a detailed assessment of the site and its context that would form part of a detailed planning application. The emerging development	Proposal revised. The 25% non-residential largely includes B1 employment uses and the potential for some retained station car parking. The Sites Schedule format has been updated to more appropriately describe the potential mix of uses. Proposed higher figures would need to be justified on design. Barnet's Tall Buildings Study Update provided the basis for identifying strategic locations where tall building proposals may be appropriate. While this site	Yes

		proposals at High Barnet Station is for 294 residential homes, which is broadly aligned with the indicative residential capacity stated in the site allocation. Suggest the indicative capacity is updated to include a more rounded of c. 300. Given the need to optimise accessible brownfield land and site allocations, request that the text explains that the indicative capacities stated are estimates at this stage and the true capacity would be determined through detailed feasibility studies and pre-application dialogue. Text states that the site is not a 'tall building location' and 8 storeys or more would not be appropriate. It should be fully acknowledged by the draft Site Allocation that the High Barnet site has excellent transport accessibility and is one of the most sustainable brownfield sites in the Borough given its location adjacent to an existing transport hub, and therefore that its suitable for an increase in density. The correct height and massing of a development proposal should be informed by a detailed site capacity study that includes examining the local townscape impact. Should be seeking to reduce and remove car parking within the Borough as part of a response to the Climate Emergency and need to create healthy streets. The wording should be amended so that it reflects this objective and positively supports a reduction. An amendment is requested as follows: " <b><u>the loss of public car parking spaces as part of the redevelopment is supported where the proposal improves sustainable modes of transport and has helped mitigated adverse impacts.</u></b> " Site plan for the emerging proposal has been amended since the 'Call for Sites' consultation in 2019. TW/TfL request that the draft site allocation boundary is updated accordingly.	has been assessed as suitable for intensification and residential uses, buildings of 8 storeys or more would not be appropriate. The Local Plan supports and encourages sustainable modes of transport while recognising that some car parking may continue to be required. The Council's approach requires reductions in car parking to be justified.	
TfL CD	Site 44	Feasibility work indicates that the suggested residential capacity of 292 should be achievable. To ensure optimised housing delivery, suggest this is raised to 300. 25% of the development as "mixed uses (public car parking and employment)" is unfeasible and would not accord with officers' pre-application advice and Council aspirations. TfL's intention is to provide a mix of uses on the site to deliver housing and commercial and community floorspace that is complimentary to the high street at Chipping Barnet (and also Underhill). 25% car parking and commercial uses would compete with the high street. TfL only intends to provide a relatively small amount of replacement car parking for passengers when it redevelops the site, for the reasons set out above. Therefore, we suggest that the Proposed use types is amended: " <b><u>residential with limited commercial and community floorspace that would complement the town centre 25% mixed uses (public car parking and employment).</u></b> " Amend references to car parking: " <b><u>An assessment must be undertaken of public car parking spaces lost and mitigation provided to encourage the use of public transport and active modes of travel. replacement spaces may be required.</u></b> " TfL CD considers that all sites close to public transport hubs could be appropriate for tall buildings in order to optimise housing delivery. Request Council to re-consider and assesses whether the High Barnet site could be suitable for a taller building/s given its excellent public transport accessibility, location adjacent to an existing transport hub, local site topography and distance from any other housing.	See response above to Taylor Wimpey.	Yes
HADAS	Site 45	Add: This site abuts an APA and as a major site should be subject to an archaeological assessment.	Agreed	Yes
CPRE	Site 45	We strongly object to proposals to build a residential development of 149 homes as this site which is a vital area of green space and will be much needed to serve the local population including new residents of major development nearby.	Proposal will ensure retention of the sites best natural features and provide a new community facility. Legal agreement will secure maintenance and management for future generations.	No
Barnet Society	Site 45	Opposed to the building of so many homes on this site and wish to see more imaginative use of the open space for educational, therapeutic and food production purposes.	. See response above to CPRE	No
Elizabeth Silver	Site 45	Agriculture & Community facilities Change to be made: Proposed use: Nature reserve for nature study for local schools (Ashmole, QE Girls, QE Boys) and other Barnet schools. A 10% retention for mixed uses- community uses and local green space, is woefully small. The community uses could mean built-on space. Therefore the remaining green space of 5% or less will be a fragmented space in which there will be very little wildlife. An appreciation of nature is particularly important for the next generations.	See response above to CPRE	No

Gwyneth Cowing Will Trust	Site 45	Support approach of around 149 new homes along with community uses and green space. The site description should include reference to a number of buildings on site, which detract from the character and appearance of the conservation area. Do not consider the site should be named "Whalebones Park". The land in question does not form part of a "Park". Land within the grounds of Whalebones House (which is in separate ownership) may form part of a parkland setting for the House, but that is not part of the proposed allocation. The site should be renamed as <b><i>Land adjoining The Whalebones</i></b> .	Proposal revised to reflect existing buildings on and around the site and name of planning application.	Yes
Mayor of London	Site 45	Welcome the provision of a local open space as part of the development. Given the sites agricultural use, allotments could be provided here, if there is local demand	Welcome this support	No
Theresa Villiers	Site 45	Welcome green belt protection in the draft Plan; however, would ask the Council to consider reclassifying Whalebones fields as green belt or local green space. As noted re Whalebones has importance in local community and nature value	This was considered by the Green Belt / MOL Study review which demonstrates no justification for making revisions to existing and MOL boundaries. Proposal will ensure retention of the sites best natural features and provide a new community facility. Legal agreement will secure maintenance and management for future generations.	No
Zizer London	Site 46	In the light of pre-application engagement with council officers and the collaborative approach which has underpinned and shaped the development proposals for the site, which are now subject to the pending planning application, we request that the allocation for Site 46 within the LONDON PLAN is revised to better align with the agreed scope of the pending planning application (ref: 19/6551/FUL) In terms of the proposed use, officers have confirmed that they are supportive of a residential only development. Indeed, given the residential site context of the site, a residential only development was stated as the 'preferred approach' in the pre-application advice response, subject to the necessary contributions towards employment and skills within the Borough The capacity of the site has been a key consideration through the design process and the current application proposes 197 new dwellings, 61 of which will be within the refurbished IBSA House and a further 136 in the new development blocks to the rear of the site. The height and mass of the new blocks have been carefully designed to respect the existing 5-storey element of IBSA House and reduce in height towards the neighbouring residential boundaries to the south and east. As the redevelopment is proposed to be purely residential, and no B1 floorspace is proposed, the site can comfortably accommodate the proposed capacity whilst also delivering ample open space. The development timeframe for the site referred to in the LONDON PLAN is 6 – 10 years. On the basis a full planning application for the redevelopment of the site was validated in Dec2019 and a Spring committee date is being targeted, we would suggest this timeframe is very conservative and a timescale of 3 – 5 years is more appropriate. In summary, based on the above and the work undertaken with Barnet Council in shaping the proposals for the site, we suggest the following changes are made to the draft allocation for Site 46: Proposed use type/s: residential-led with 20% B4 use, Indicative residential capacity: 425 up to 200, Initial planning considerations: Proposals must be of appropriate scale and design that responds to the context. There should be delivery of high quality residential-led mixed-use development comprising a range of housing types and tenures, including family homes. B4 uses should be provided to support economic growth and employment through provision of workspace for small and medium-sized enterprises. Proposals must ensure development does not negatively affect the small area of Green Belt at the north of the site. The policy list within the draft allocation should also be reviewed and we would suggest policy EY02 'Affordable Workspace' is removed.	Proposal revised and updated to reflect planning consent	Yes
Roger Tichborne	Site 46	Missed opportunity for a more mixed development on a large site, removing employment opportunities. Must have cast iron protections for the Green Belt and not compromise the local wildlife during the development. The timescale seems far fetched, given the vacation date of IBSA.	Proposal revised and updated to reflect planning consent	Yes



Mayor of London	Site 46	The site allocation should be clear how the industrial capacity is to be re-provided	Proposal revised and updated to reflect planning consent Industrial capacity was considered as part of decision on 19/6551/FUL	No
Caroline Thomas and Bob Ganly	Site 46	This proposal is bound to increase traffic in Partingdale Lane, Bittacy Hill, Engel Park and The Ridgeway.	Proposal revised and updated to reflect planning consent.Traffic generation was considered as part of decision on 19/6551/FUL	No
Thames Water	Sites 7, 8, 47 & 50	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <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> .	Proposals revised to reflect the potential need for water supply network infrastructure upgrades.	Yes
CPRE	Site 47	A section of Green Belt is included within site. It is vital to protect green space in this area which is subject to extensive redevelopment for about 2500 new homes, in particular because Para 10.5.24 in the Reg 18 document states that the Barnet Green Belt and MOL Study has found that all existing areas of Barnet's Green Belt meets one or more purposes set out in the NPPF.	Any future development proposals that come forward will be assessed in relation the relevant environment policies and where relevant, in accordance with NPPF paras 133 to 147.	No
TfL CD	Site 47	Timeframe should be amended to 5 – 10 years. TfL is unlikely to include car parking provision within a mixed-use scheme (except for people with disabilities) and such references should be deleted from the Proposed use type/s: " <del>residential with 40% mixed uses (retained rail infrastructure, car parking).</del> " References to car parking in the final sentence should be modified: " <i>An assessment of public car parking requirements must be undertaken and <b>mitigation provided to encourage the use of public transport and active modes of travel.</b></i> <del> provided as required.</del> "	Maintain timescale at 11-15 years unless further evidence of earlier development is available. The percentage for proposed non-residential uses reflects retained transport infrastructure and provides guidance for development. The Council's approach to redevelopment of car parks is set out at GSS12	No
Roger Tichborne	Site 47	Must ensure no limitation on the future provision of a two track layout for the station and an extension to the Saracens/Copthall site. This trackbed must be protected.	Proposal requires retention of tracks. Such an extension has not been highlighted by the London Plan or Barnet's Long Term Transport Strategy.	No
Elizabeth Silver	Site 47	Placing housing on the Mill Hill East Station site (site 47) works against policies TRC01 and TRC02.	Station and transport infrastructure should be enhanced as a consequence of this proposal	No
Caroline Thomas and Bob Ganly	Site 47	Once more, public car parking here very much needs to be extended, rather than reduced, especially with the influx of many more people to the area. The plan mentions "large areas of surface car parking" nearby - but these are used to capacity by those visiting the gym, the GP and the supermarket	Given the needs to deliver new homes and reduce dependency on the car there are good sustainable reasons to redevelop car parks. Surface level car parking is considered an inefficient use of land when PTAL is high. The Council's approach to redevelopment of such car parks is set out at GSS12	No
Elizabeth Silver	Site 47	Change to be made: No residential capacity or community facilities at this site, as the station will need to be expanded. A much greater usage is envisaged due to 4390 new homes in Mill Hill East. With 4390 new homes in Mill Hill East (2245+1400+745 , see GSS07), and an estimate of 2000 extra people using this station every day, it is nonsense to constrict the only underground station within easy reach of the new developments. This proposal goes against TRC01.	The proposal is supported by TRC01.	No
Roger Tichborne	Site 48	Any redevelopment must ensure that there is no loss of provision at any time, given the integral role of the library for young people and elderly residents. The architectural importance of the site should also be recognised.	Re-provision of the library is highlighted as a requirement. Sensitive design including retention of the existing building are listed as important planning considerations for the site.	No

Caroline Thomas and Bob Ganly	Site 48	We fear that this development would kill off the Community Hub, disrupting its functioning for a considerable time at the very least. Its distinctive, listed building might well be swallowed up in the residential buildings.	.See response above to Roger Tichborne	No
Former MHNF	Site 48	We see that once the library is moved to Daws Lane, its current site in Hartley Ave could be redeveloped along with adjacent sites to deliver a new 'fit for purpose' medical centre, together with re-provision of parking and a more substantive number of residential flats/offices leading down to the Broadway. We accept that these properties are in different ownership, but such a development, close to the Broadway's shops and restaurants, and to its good transport links, would be highly sought after. Its design and density could be similar to the existing Titan Court on the opposite side of the road.	See response above to Roger Tichborne	No
Mayor of London	Site 48	Welcome the requirement to replace the community use	The Council welcomes this support for re-provision of community facilities.	No
Mayor of London	Site 49	Development should not extend beyond the exiting footprint of the buildings and should not impact the openness of the Green Belt	Agreed. Proposal reflects this.	No
Geoffrey Silver	Site 49	ECC06, part d, seeks to enhance biodiversity by "ensuring that development makes the fullest contributions to enhancing biodiversity and protects existing site ecology ... through on-site measures". However, the proposal for site 49 would inevitably reverse the aim of this policy by changing the use of landscaped gardens to housing. Currently, many species, including badgers, barn owls and a great variety of birds use this site as a habitat and green corridor.	Any development proposal that comes forward for this site will need to be in compliance with policies contained within the Local Plan.	No
Former MHNF	Site 49	Watch Tower and Kingdom Hall, both parcels of land are of similar area, are in Green Belt and in Mill Hill's Conservation Area. The current total developed footprint is estimated to be around 8%. The permit for JW 'major developed site' on Green Belt does not sanction increasing this footprint. There are no plans to release Green Belt or Metropolitan Open Land (MOL) for residential development (Policy ECC05 and alternative option). Building on 50% of the total area, which could mean 100% of one of the fields, would destroy the Green Belt and harm the green corridor (parallel to the Ridgeway) which is vital for wildlife.	Any development proposal that comes forward for this site will need to be in compliance with policies contained within the Local Plan. Any proposal that is not within the footprint of previously developed land must demonstrate very special circumstances.	No
CPRE	Site 49	This site is situated within the Green Belt and so only the current built footprint should be redeveloped. Non-developed Green Belt within this site must remain undeveloped as outlined in both NPPF and the Local Plan review. IMPORTANT NOTE: There is a discrepancy between the Regulation 18 consultation stating an indicative residential capacity of 219 and the Integrated Impact Assessment which states an indicative residential capacity of 493. If the latter number is larger because the proposal is in fact to develop the whole site (not just the existing built footprint) then we object strongly to that.	Any future development proposals that come forward for this site will be considered in accordance with NPPF paragraph 133 to 147. Figure in IIA for site 49 has been revised as has GSS07	Yes
Roger Tichborne	Site 49	A missed opportunity for a more mixed development on a large site, removing employment opportunities. Cast iron protections for the Green Belt. Timescale unrealistic Local wildlife must be protected both from development and disturbance during development.	Proposal acknowledges that this is a sensitive site. It outlines need for retention of community uses, and clearly sets out the Green Belt and Conservation Area status as well as the need to respond to nature conservation value including TPOs. Any proposal that is not within the footprint of previously developed land must demonstrate very special circumstances.	Yes
Manni Sadaghiani	Site 49	Object to development of the JW site. My home directly faces this land and any kind of development on this site will have a direct and profound impact on the quality of my life. The land in question is located among a neighbourhood, living a life in a semi-rural environment, entirely comprised of semi detached 1930s built 2 story houses. Any new development, matching those already filling the old Army Barracks and the Medical research site nearby, will totally destroy its current character. I was also made to believe the site is on Green Belt, which must remain open for all to enjoy.	See response above to Roger Tichborne. Support for increasing access to Green Belt is welcome.	Yes
Steve Jacobs	Site 49	The new proposed plan backs directly onto garden and will impose on premises. Opposed to the development and will take further action if necessary. Area has been overrun by new developments and	See response above to Roger Tichborne	Yes .

		no additional infrastructure has been built. The Site is a habitat for wildlife & protected species. There are a number of large mature trees which are protected by TPO's. Part of a green corridor going all along the Ridgeway, including Driver's Hill to the Mill Fields which will be fragmented.		
Chris Carabine	Site 49	<p>Site is in the Mill Hill Conservation area and the Green Belt and, as a semi-rural area, it would be entirely inappropriate to develop the Watchtower site as proposed. Increasing the built footprint to 50% would destroy the semi-rural character of the two sites and breach the Green belt requirement to remain open and permanent. Construction of a new building on Green Belt is inappropriate unless it is in the same use and not materially larger than the one it replaces. Buildings must not have a greater impact on the openness of the Green Belt than the existing development. The proposal at Watchtower would exceed the current level of development. The policy wording states "any development must consider the Mill Hill Conservation Area and Green belt designations" – surely this must include not increasing the development footprint at Watchtower House and Kingdom Hall beyond the existing. Obviously this footprint must not include the "car park" at Watchtower as it is in illegal use having exceeded its temporary use allowance granted when permission was originally granted as tennis courts. I believe the current development levels in Mill Hill East and the above-mentioned designations would not meet the tests set out in NPPF (para 137) necessary in order to demonstrate exceptional circumstances sufficient to justify Green Belt release. There are currently 85 accommodation units on a small footprint and three stories at Watchtower House but these are akin to student hall accommodation rather than flats. It would be disingenuous to refer to them as residential units in the normal sense. The Draft development plan for site 49 gives 219 flats ie substantially larger units on more storeys, or development on a much larger footprint in breach of Green belt expectations. Hard to see how this residential growth on this site can comply with "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt." Habitat for wildlife &amp; protected species The Watchtower House and Kingdom Hall sites provide a vital green corridor between the gardens of Bittacy Park Avenue, running parallel to the Ridgeway, including Drivers Hill (a Site of Borough Importance for Nature Conservation) all the way to the Mill Field and Lawrence Street and the green areas at the rear of the Mount School. I am a birdwatcher and naturalist and have regularly witnessed over 20 species of birds in Bittacy Park Avenue and Watchtower House gardens including 2 species of woodpecker, nuthatch, goldfinch, greenfinch, jay, jackdaw, 4 species of tit, tawny owl, song thrush and migratory and passing birds such as blackcaps, redwings, buzzard, and kestrel. There are also regular mammals including badger, muntjac deer hedgehogs and squirrels. Any roads built through the greenbelt area inevitably to service the new dwellings will create a barrier to wildlife migration and isolate wildlife and habitat. Building on a larger footprint than at present will fragment the green corridor which surely must be retained for this land-based wildlife. I believe residents would lose the amenity of seeing this diversity of wildlife and well as the obvious impact on the ecology of the area. The mature and diverse trees in the areas concerned, particularly at the rear of Bittacy Park Avenue gardens, must be protected for their visual amenity, enhancement of privacy and most importantly for the wildlife which depends on them for feeding and nesting. I cannot conceive that any developer would honour the existing TPO's with such gains to be made on development and such derisory sanctions attached to TPO breaches. From NPPF para 174. "To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks.....; wildlife corridors and stepping stones that connect them; ... and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. " Have these plans been drawn up? Surely any development proposals must be contingent on such plans having been drawn up and the safeguarding and conservation issues identified. I would like to hear who will undertake this work and for residents including myself to be consulted at all stages. Amenity. Even if</p>	See response above to Roger Tichborne	Yes

		the trees survive, any vertical development to the rear of Bittacy Park Avenue will lead to significant loss of visual and audible amenity compared to current amenity and there will be inevitable loss of privacy given that we are not currently overlooked at all.		
Gwenda Levy	Site 49	I would like to object most strongly. The proposed development and density would have a huge impact on this Green Belt Conservation Area. With only: One Tube Station - a VERY limited branch line too Two bus routes, One small doctor surgery, One supermarket, One park for children to play in. One local primary school in the immediate vicinity - St Vincent's. This proposed development is putting more strain on the already over-extended amenities and limited infrastructure we currently have. To add to this point, the amount of HGV's that will be pouring into our area will further damage the already broken roads. The hole at the end of Bittacy Park Avenue, next to the bus stop on Engel Park, is now so vast that all vehicles have to go round it by veering on to the opposite side of the road. This is not something that can take any further strain. The destruction of the already depleted wildlife and biodiversity should be taken into consideration. We live in a beautiful area full of remarkable species that must not be ignored or disregarded. Also carparks and tennis courts should not be considered as footprint and development allowed. The existing footprint for both sites is 6% and the London Plan states: <i>Buildings must not have a greater impact on the openness of the Green Belt than the existing development</i> (London Plan 2019 & NPPF paras 133, 145.)	See response above to Roger Tichborne. Any future development proposals that come forward for this site will be considered in accordance with NPPF paragraph 133 to 147	Yes
Nathan Aziz Levi	Site 49	I would like to strongly object to the proposed development of the Kingdom Hall Jehovah's Witness site. The plans go over the footprint of the existing site by a huge amount, going against everything you claim to stand for. Tennis courts and car parks are not to be considered as part of the footprint and development allowed. The environmental impact on our area will be immense. Roads will be more blocked and heavily used than they already are. We have potholes the size of craters in our roads as it is causing disruption and damage to our vehicles. The HGV'S that the builders will be using on an hourly basis will only further impact this as the years go on. There are no school places as it is. There is only 1 branch line tube station. 2 bus routes that are already under immense strain. 1 doctor surgery and 1 supermarket. Where do you propose these new residents and their offspring go? Consideration must also be given to the impact this project will have on the local air quality, both in terms of pre-, during and post-development. The increased influx of cars and vehicles will most certainly have an impact on our wildlife, our children and their ability to breathe clean air	See response above to Roger Tichborne The Infrastructure Delivery Plan (IDP) provides an assessment of current infrastructure provision, future needs, gaps and deficits, along with an indication of costs of providing infrastructure. This is a live document that will be continuously updated. Planning Obligations in the form of CIL and S106 will be used to help deliver new social infrastructure in the Borough, including health facilities.	Yes
Elaine Ryder	Site 49	Site is in the Mill Hill Conservation area and the Green Belt and, as a semi-rural area, it would be entirely inappropriate to develop the Watchtower site as proposed. Increasing the built footprint to 50% would destroy the semi-rural character of the two sites and breach the Green belt requirement to remain open and permanent. Construction of a new building on Green Belt is inappropriate unless it is in the same use and not materially larger than the one it replaces. Buildings must not have a greater impact on the openness of the Green Belt than the existing development. The proposal at Watchtower would exceed the current level of development. The policy wording states "any development must consider the Mill Hill Conservation Area and Green belt designations" –this must only include the development footprint of the current Watchtower House and Kingdom Hall . This footprint must not include the "car park" at Watchtower as it is in illegal use having exceeded its temporary use allowance granted when permission was originally granted as tennis courts. It would appear that the current development levels in Mill Hill East and the above-mentioned designations would not meet the tests set out in NPPF (para 137) necessary in order to demonstrate exceptional circumstances sufficient to justify Green Belt release. There are currently 85 accommodation units on a small footprint and three stories at Watchtower House This accommodation is similar to student hall accommodation rather than flats. It would be disingenuous to refer to them as residential units in the normal sense. The Draft development plan for site 49 gives 219 flats these we assume will be substantially larger units and will require more storeys, or development on a much larger footprint in breach of Green belt expectations. It is therefore	See responses above to Roger Tichborne and Nathan Aziz Levi.	Yes

		<p>difficult to see how this residential growth on this site can comply with “ <i>A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt.</i>” The Watchtower House and Kingdom Hall sites provide a vital green corridor between the gardens of Bittacy Park Avenue, running parallel to the Ridgeway, including Drivers Hill (a Site of Borough Importance for Nature Conservation) all the way to the Mill Field and Lawrence Street and the green areas at the rear of the Mount School. The wide range of species of birds observed in Bittacy Park Avenue and Watchtower House gardens is exciting. including 2 species of woodpecker, nuthatch, goldfinch, greenfinch, jay, jackdaw, 4 species of tit, tawny owl, song thrush and migratory and passing birds such as blackcaps, redwings, buzzard, and kestrel. There are also regular mammals including badger, muntjac deer hedgehogs and squirrels. (photographic evidence of these can be supplied). Any roads built through the greenbelt area inevitably to service the new dwellings will create a barrier to wildlife migration and isolate wildlife and habitat. Building on a larger footprint than at present will fragment the green corridor which surely must be retained for this land-based wildlife. The mature and diverse trees in the areas concerned, particularly at the rear of Bittacy Park Avenue gardens, must be protected for their visual amenity, enhancement of privacy and most importantly for the wildlife which depends on them for feeding and nesting. I cannot conceive that any developer would honour the existing TPO's with such gains to be made on development and such derisory sanctions attached to TPO breaches. From NPPF para 174. “To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks.....; wildlife corridors and stepping stones that connect them; ... and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. “ Have these plans been drawn up? Surely any development proposals must be contingent on such plans having been drawn up and the safeguarding and conservation issues identified. I would like to hear who will undertake this work and for residents consulted at all stages</p> <p>Community Infrastructure There has already been very substantial residential development and population increase in Mill Hill ward and the infrastructure is not keeping up. There are no new supermarkets hence the existing one struggles to maintain stock , there are no new GP surgeries as developers failed to deliver a new surgery on Millbrook Park and roads are over-used and becoming very dilapidated and unsafe. Passengers at Mill Hill East TFL station are already experiencing difficulties boarding trains in rush hour periods and there will be many more residents to service on completion of Ridgeway views on the site of the former Medical research centre and the Millbrook Park etc developments at the Council Depot and Barracks sites Amenity - Even if the trees survive, any vertical development to the rear of Bittacy Park Avenue will lead to significant loss of visual and audible amenity compared to current amenity and there will be inevitable loss of privacy given that we are not currently overlooked.</p>		
Cesira de Chiara	Site 49	<p>Specific requested CHANGE: Permissible built footprint to be no more than the current one which is 10% on the Watchtower site and 2% on the Kingdom Hall site. Height of buildings to be no more than 3 stories as at present. The following REASONS should be taken into account: The site is in the Mill Hill Conservation area and has a semi-rural character Increasing the built footprint to 50% would destroy the semi-rural character of the two fields. The site is on Green Belt, which must remain open and permanent. Construction of a new building on Green Belt is inappropriate unless it is in the same use and not materially larger than the one it replaces. Buildings must not have a greater impact on the openness of the Green Belt than the existing development (from London Plan- 2019, and NPPF paras 133, 145).The current built-on footprint is 6% for the two sites. The car parks do not have planning permission-they were applied for as tennis court. The JW development had been classified at some point as a “major development on Green Belt” because there are more than 10 dwellings / more than</p>	See response above to Roger Tichborne	Yes

		1000 m2 of non-residential space but this does not sanction an increase in built height, on a footprint of 50% (of the 73,000 m2). The site is a habitat for wildlife & protected species such as badgers an barn owls. There are also a significant number of la4e mature trees which are protected by TPOs. It is part of a green corridor going all along the Ridgeway, including Driver's Hill to the Mill Fields, which will be fragmented if the proposed development goes ahead The proposed building density would mean a loss of amenity and privacy for the adjacent gardens		
Elizabeth Silver	Site 49	<p>The site is on Green Belt and in the Mill Hill Conservation area. Change to be made: Permissible built footprint to be no more than the current one which is 10% on the Watchtower site and 2% on the Kingdom Hall site. Height of buildings to be no more than 3 stories as at present. Green Belt to be retained in the same proportion as at present. Car parks to be converted to tennis courts or green space. The site is a habitat for wildlife and is part of a green corridor. The proposed development of building on 50% of the area with 219 housing units is not permissible by: 1. The criteria in NPPF paras 133,145, 174 2. The London Plan para 8.2.2, Policy G2, 3. Barnet's Policy ECC05 4. Barnet Draft Plan 10.5.1, 10.5.2, 10.5.19. 5. Barnet Policy HOU01 says that GB/MOL land should not be released for housing. Policy ECC05 in Barnet Draft Plan: "<i>i. Any proposals for development in Green Belt will be considered in accordance with NPPF paras 133 to 147. ii. Development adjacent to Green Belt should not have a significant detrimental effect on the openness of the Green Belt and respect the character of its surroundings.</i>"</p> <p>The proposed building density would mean a loss of amenity and privacy for the adjacent gardens <i>Barnet Draft Plan 6.8.1</i>. The local health facilities, near Waitrose, are overwhelmed even before the Mill Hill East estate is fully occupied. The chance to have a separate GP surgery on the Millbrook estate was by-passed. The current residential capacity is 85, on three stories, with a total built footprint of 6% on both sites. The Draft Plan mentions a residential capacity of 219 and the Impact Assessment even suggests 493 units with no Green Belt retained. The higher figure is apparently a mistake. However, even 219 would destroy the Green Belt and semi-rural character on that site. Exceptional circumstances cannot be claimed (Policy ECC05) to justify increasing the footprint to 50% or more and tripling the number of housing units from 85 to 219.</p> <p>The Jehovah's Witnesses development had been permitted because it was for a charity/ educational institution and had a relatively small footprint of 6%.. It was classified as a "major development" because there are more than 10 dwellings / more than 1000m2 of non-residential space / site is more than 1 hectare (NPPF definition p 68). The rest of the site, that is more than 90%, consists of gardens.</p> <p>Footprint: The Watch Tower site (east field) has a built footprint 10%. This was woodland prior to the 1960s when the Jehovah's Witnesses moved in. The IBSA website gives the built foot print of the Watchtower House site as 4571/ 32629 = 14% so this must include the car parks. The on-site car parks were built without planning permission. They were applied for as tennis courts ( Ref: W03005AJ ) in 1997 with 'temporary' use for car parking while building works were going on (correspondence available) but have been in continuous use since then as car parks. These areas must therefore be returned to green belt. Kingdom Hall site (west field) - built footprint 2%. It was previously a farm, and sheep were kept there. These footprints have been carefully measured from the map. Both sites have a similar area of 8 acres (32,000m2) so the percentage for the combined site is 6%. The site is a habitat for wildlife which must be respected. <i>Barnet Draft Plan 10.5.1, 10.5.2, 10.5.19</i>. It provides a green corridor, which reaches from the gardens of Bittacy Park Avenue, parallel to the Ridgeway, including Drivers Hill (a Site of Borough Importance for Nature Conservation) all the way to the Mill Field and Lawrence Street. Building on a larger footprint than at present will fragment the green corridor which must be retained for land-based wildlife. There are Barn Owls and Badgers on the site, both protected species. It should be noted that community use would mean a less protected habitat for wildlife. There are also a number of large mature trees which are subject to Tree Preservation Orders e.g. TRE/HE/6</p>	<p>See response above to Roger Tichborne</p> <p>The Watchtower House site was previously identified as a Major Development site within the Green Belt in the 2006 Unitary Development Plan (UDP) due to its existing uses and were considered suitable for redevelopment and/ or infilling.</p> <p>Any future development proposals that come forward for this site will be considered in accordance with NPPF paras 133 to 147</p>	Yes

		dating from 1953. <i>“The Mayor wants to increase tree canopy cover in London by 10 per cent by 2050.”</i> London Plan para 8.7.2		
Geoffrey Silver	Site 49	Watch Tower House has 85 residential units and three floors. Careful mapping shows that it occupies 10% of the eastern half of site 49, which is landscaped gardens with protected mature trees. This 10% figure excludes the so-called “tennis courts” used permanently as car parks without planning permission. Kingdom Hall occupies 2% of the western half which is a grassy field. Together, the two buildings have a combined footprint of 6% of the whole of site 49. The proposal is for 219 homes (hopefully not 493 as in the Impact Assessment) in 40% of the whole site, community use 10%, and undeveloped Green Belt 50%. Presumably the western half would remain virtually undeveloped, and the eastern half would be filled with housing and community use. This would be a huge further intrusion of building in the eastern half, when the whole site is a conservation area in the Green Belt. The new London Plan states that: □ “Development proposals that would harm the Green Belt should be refused”, and “Green Belt de-designation will not be supported” (policy G2) □ “Openness [i.e. lack of buildings] and permanence are essential characteristics of the Green Belt” (section 8.2.2) □ “Boroughs should support the protection and conservation of priority species and habitats ... and promote opportunities for enhancing them using Biodiversity Action Plans” (policy G6, part B3). Site 49 is enjoyed as a Green Belt habitat and green corridor by many species, including badgers, barn owls and many other birds. This proposal would also very seriously damage the amenity of neighbours with gardens backing on to the Watch Tower House site’s eastern half. The huge leap in development would destroy its Green Belt openness and permanence, and thus render its designation as Green Belt meaningless. Is the Indicative residential capacity 219 or 493? The Barnet Draft Local Plan (Reg 18) states <i>“Indicative residential capacity: 219”</i> where as its ‘Part 2 – Integrated Impact Assessment with Appendices’ states <i>“Indicative residential capacity: 493”</i> .	See response above to Roger Tichborne  Figure in IIA for site 49 has been revised as has GSS07	Yes
Marsfield (Avison Young)	Site 49	We strongly support inclusion of Watchtower House; however, we would request that the ‘proposed use type/s’ is extended to include reference to the suitability of SOPH on this site (as well as general housing). <b>Suitability</b> - Policy H13 (Specialist Older Person Housing) of LONDON PLAN requires Boroughs, when identifying sites suitable for SOPH, to consider local housing need and how well-connected the site is; in terms of contributing to an inclusive neighbourhood, having access to relevant facilities, social infrastructure, health care, and being well served by public transport. Watchtower House site is able to demonstrate both of these points: As discussed above there is a clear need for SOPH; site will contribute to an inclusive neighbourhood, by forming a key connection between traditional residential developments at Millbrook Park and NIMR, within the Mill Hill East Growth Area, whilst introducing SOPH to create a more mixed and balanced community; The site is well located to have access to the services within the Mill Hill local centre, to the south of the site; The site is well served by Public Transport: Mill Hill East Tube Station (Northern Line) is 900m to the south of the site, along The Ridgeway, and provides direct links into Central London; The 240 Bus Route stops outside of the site, along The Ridgeway, and runs between Golders Green and Edgware Stations; and 221 Bus Route stops 150m to the south of the site, along Engel Park, and runs between Edgware Bus Station and Turnpike Lane Station. In addition to the above, we would like to reiterate that the site continues to be both available and achievable: <b>Availability</b> - Site is privately owned, within single ownership and there are no Agricultural Tenancies. Existing tenants (IBSA) are in process of being relocated to a new facility in Essex, which is expected to be completed by the end of 2020, allowing the site to become available for redevelopment. The landowner is actively seeking to redevelop the site. <b>Achievability</b> - PPG (Para 020) advises that a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. Marsfields have confirmed their intentions to redevelop the site for SOPH. In their view the site presents a realistic and viable opportunity for development which would be attractive to future residents.	See response above to Roger Tichborne  Any development proposal that comes forward for this site will need to be in compliance with policies contained within the Local Plan.	Yes

		Marsfields sought pre-application advice from LB Barnet and three meetings were held between Oct and Nov 2019. A pre-application response was received from LB Barnet on 12th Feb 2020, which noted that officers were encouraged by the design progress made and stand ready to support the applicant in developing the scheme further.		
Lucia Carabine	Site 49	<p>The site is in the Mill Hill Conservation area and the Green Belt and, as a semi-rural area, it would be entirely inappropriate to develop the Watchtower site as proposed. Increasing the built footprint to 50% would destroy the semi-rural character of the two sites and breach the Green belt requirement to remain open and permanent. Construction of a new building on Green Belt is inappropriate unless it is in the same use and not materially larger than the one it replaces. Buildings must not have a greater impact on the openness of the Green Belt than the existing development. The proposal at Watchtower would exceed the current level of development. The policy wording states "any development must consider the Mill Hill Conservation Area and Green belt designations" – surely this must include not increasing the development footprint at Watchtower House and Kingdom Hall beyond the existing. Obviously this footprint must not include the "car park" at Watchtower as it is in . We have seen bats over the years and are worried about disturbing their habitat. Mill Hill East and the above-mentioned designations would not meet the tests set out in NPPF (para 137) necessary in order to demonstrate exceptional circumstances sufficient to justify Green Belt release. There are currently 85 accommodation units on a small footprint and three stories at Watchtower House but these are akin to student hall accommodation rather than flats. It would be disingenuous to refer to them as residential units in the normal sense. The Draft development plan for site 49 gives 219 flats ie substantially larger units on more storeys, or development on a much larger footprint in breach of Green belt expectations. Hard to see how this residential growth on this site can comply with " <i>A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt.</i>"</p> <p><b>Habitat for wildlife &amp; protected species</b> The Watchtower House and Kingdom Hall sites provide a vital green corridor between the gardens of Bittacy Park Avenue, running parallel to the Ridgeway, including Drivers Hill (a Site of Borough Importance for Nature Conservation) all the way to the Mill Field and Lawrence Street and the green areas at the rear of the Mount School. [There is a wide range of species present on site]. Any roads built through the greenbelt area inevitably to service the new dwellings will create a barrier to wildlife migration and isolate wildlife and habitat. Building on a larger footprint than at present will fragment the green corridor which surely must be retained for this land-based wildlife. I believe residents would lose the amenity of seeing this diversity of wildlife and well as the obvious impact on the ecology of the area. The mature and diverse trees in the areas concerned, particularly at the rear of Bittacy Park Avenue gardens, must be protected for their visual amenity, enhancement of privacy and most importantly for the wildlife which depends on them for feeding and nesting. I cannot conceive that any developer would honour the existing TPO's with such gains to be made on development and such derisory sanctions attached to TPO breaches. From NPPF para 174. "To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks.....; wildlife corridors and stepping stones that connect them; ... and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. " Have these plans been drawn up? Surely any development proposals must be contingent on such plans having been drawn up and the safeguarding and conservation issues identified. I would like to hear who will undertake this work and for residents including myself to be consulted at all stages</p> <p><b>Community Infrastructure-</b> There has already been very substantial residential development and population increase in Mill Hill ward and the infrastructure is not keeping up. There are no new supermarkets hence the existing one struggles to maintain stock, no new secondary schools, and roads are over-used and becoming very dilapidated and unsafe.</p>	<p>See responses above to Roger Tichborne. and Nathan Aziz Levi.</p> <p>Any development proposal that comes forward for this site will need to be in compliance with policies contained within the Local Plan.</p>	Yes



		Passengers at Mill Hill East TFL station are already experiencing difficulties boarding trains in rush hour periods and there will be many more residents to service on completion of the Millbrook Park etc developments at the Council Depot and Barracks sites. Even if the trees survive, any vertical development to the rear of Bittacy Park Avenue will lead to significant loss of visual and audible amenity compared to current amenity and there will be inevitable loss of privacy given that we are not currently overlooked at all.		
Hilary Yarde Martin	Site 49	I object to the significant change in the built footprint. Currently the built areas of the combined sites are only about 6% of the total. I would like the built footprint to remain at this level and for the proposals to be left at a maximum of 3 storeys. This site, which adjoins our garden, is in the Mill Hill Conservation Area. The semi-rural nature of this site would be destroyed. This site is on the Green Belt and as such the construction of new buildings is inappropriate." 2.0.2 London's green and open spaces are a vital part of the capital. Its parks, rivers and green open spaces are some of the places that people most cherish and they bring the benefits of the natural environment within reach of Londoners. London's Green Belt and Metropolitan Open Land designations serve to protect these strategically-important open spaces, prevent urban sprawl and focus investment and development on previously developed land." Draft London Plan – consolidated changes version – July 2019. Current owners of Watchtower House applied for construction of tennis courts several years ago as part of the garden area. These "tennis courts" have been used as "overflow" car-parks on a daily basis ever since. They should not be considered as part of the built up area and thus to be converted to housing. The site is a wonderful habitat for all kinds of wildlife, including a pair of nesting barn owls, badgers and foxes. The open field provides hunting ground for buzzards and more recently red kite. Wooded area provides cover for firecrests, woodpeckers, nuthatches, treecreepers amongst other more common birds, and the holly berries provide food for the annual visit of fieldfares and redwings. Some of these are protected species. Deliberate removal of their habitat will result in decrease in their numbers. There are a large number of mature trees which are protected by Tree Preservation Orders. This is part of a green corridor which runs right along the Ridgeway. The fragmentation of this corridor will cause further decline for species like hedgehog. The proposed building density would result in a loss of precious amenity and also loss of privacy for the adjacent gardens.	Any development proposal that comes forward for this site will need to be in compliance with policies contained within the Local Plan.	Yes
Amber Infrastructure Ltd (Lichfields)	Site 49	Support aims and objectives of the site allocation and agree with the range of uses envisaged for the wider site: residential and community uses, with an element of the site kept as open land. However, we consider changes are required to the wording so the policy is sound in line with the requirements set out in the NPPF (para. 35), and provision made for educational needs also. As currently drafted, the policy wording for Site No. 49 is unclear and may be interpreted that the 50% to be maintained as open land should be the area of the site directly to the south of the Kingdom Hall. To ensure soundness, Local Plans must ensure its policies are sufficiently flexible so they are effective and can be implemented (a further key test of soundness as set out in the NPPF, para. 35). There are various options for the delivery of development on the site and we therefore suggest the following: Proposed use type/s: residential (which can include specialist housing/assisted living units), community and education with around 50% retained as of the site undeveloped Green Belt. The insertion of "around" provides sufficient flexibility to enable the site allocation to be delivered, to reflect market conditions and the site constraints. This is important to ensure the delivery of sites in Local Plans over the Plan period. These changes are consistent with the aims of the allocation but would allow more than one redevelopment option to come forward, for instance development on the northern part of both parcels with the land to the rear left open. We have also made reference to the inclusion of educational uses within the acceptable uses for the site. As set out in the pre-application submission to LB Barnet for this site, there is a need for a Special Educational Needs school, and this site has been identified as suitable for this provision. The service to be provided at this school is currently not offered at any other school within the	Proposal acknowledges that this is a sensitive site. It outlines need for retention of community uses, and clearly sets out the Green Belt and Conservation Area status as well as the need to respond to nature conservation value including TPOs. Any proposal that is not within the footprint of previously developed land must demonstrate very special circumstances. Any development proposal that comes forward for this site will need to be in compliance with policies contained within the Local Plan.	Yes

		borough and there is a pressing need for this type of facility in this location. From our client's perspective, we also consider development on the western part of the site could be delivered within the short/medium term, rather than 11-15 as stated.		
Des Yarde Martin	Site 49	I object to the significant increase in the built footprint of the site. Currently the built footprint makes up 6% of the total area; to increase this to 40% plus 10% community use, would have a significant negative impact on wildlife and on house owners, of whom I am one, whose properties border the site. This increase would destroy the semi-rural nature of the Mill Hill Conservation area as well as diminishing the rural aspect of the Ridgeway. The rural aspect of Mill Hill East has already been diminished by significant developments on the Millbrook Park Estate and the site of the erstwhile National Institute for Chemical Research. The site provides habitats for a great variety of animals: a pair of nesting barn owls, treecreepers, nuthatches, firecrests and woodpeckers plus summer visitors such as redwings and fieldfares. There are also many other more common birds that brighten gardens, trees and sky. At ground level, badgers and foxes have room to live. All of this will be jeopardised if this development goes ahead as proposed.	See response above to Roger Tichborne  Any development proposal that comes forward for this site will need to be in compliance with policies contained within the Local Plan.	Yes
Amber Infrastructure Ltd (Lichfields)	Site 49	Support inclusion within Local Plan. Whilst delivery of site is likely be split, between eastern and western parcels, we confirm our client is looking to redevelop the western parcel and therefore the allocation is deliverable; a key test of soundness of set out in NPPF (para. 35).	Support welcomed.	No
Victor Montefiore	Site 49	<u>Arbitrary land grab of undeveloped Green Belt for residential development</u> <i>Proposed use type/s: residential with 50% retained as undeveloped Green Belt and 10% community uses</i> -This implies that at least 40% of the land will be for residential development. The Council's response to this question, per Hendon Residents Forum (Wednesday 4 March 2020) was " <i>The Watchtower House site has been previously classified as a Major Development Site within the Green Belt due to the existing uses. As such, part of the site has been judged as suitable for potential redevelopment, including for residential and community uses</i> " (see reference 4). It is potentially appalling governance as there is no record of any committee and or councillors approving this 'judgement'. Further the implication that the " <i>site has been previously classified as a Major Development Site within the Green Belt due to the existing uses</i> " does not mean that it can be judged to be ripe for further extensive development. This is because the classification simply derives from the current usage per the Glossary definition (see reference 5) " <i>Major Developments: 10 or more residential units (or if a number is not given, where the area is more than 0.5 hectares), or 1,000 m2 (or more) gross commercial floorspace.</i> " <u>Problem 2 – No 'exceptional circumstances' have been demonstrated</u> The 'Alternative Options' to both BSS01 Spatial Strategy for Barnet' and 'GSS01 Delivering Sustainable Growth' set the principle that Green Belt sites should not be selected. This is wise and in accordance with NPPF para137 and also in accordance with New London Plan (Consultation Draft) Policy G2 London's Green Belt. The 'Barnet Draft Local Plan (Reg 18) Site Selection Background Report', 'Appendix 3 - List of Sites considered to be not developable' contains a list of seventeen other sites that have <u>all</u> been rejected on with the reason that they are Green Belt. And 'Section 3.1 National and London Plan Policy Context' acknowledges the importance of the NPPF " <i>Specific National and London Plan Policies to be taken into account: NPPF Section 13 Protecting Green Belt Land specifically para 134</i> " <u>Only 7% or 8% of the site is presently developed</u> . How therefore was it 'judged' that a land grab of 32% or 33% of an undeveloped Green Belt site (i.e. 2.38 hectares on which there are no buildings) is reusable for residential development? <u>Problem 4 – There is a wide ranging Tree Preservation Order on the Watchtower House Site.</u> However the 'judgement' of 40% of the site for residential development does not take into account how extensive the Tree Preservation Order TRE/HE/6 actually is. <u>Problem 5 – There are protected species – badgers and barn owls on the site</u> - However the 'judgement' of 40% of the site for residential development does not take into account the fact that protected species are on the site – protected by the Wildlife & Countryside Act 1981 and the Protection of Badgers Act 1992. <u>The Green Belt classification of the site is to protect Mill Hill</u>	The Watchtower House site was previously identified as a Major Development site within the Green Belt in the Unitary Development Plan (UDP), the statutory development plan for the Borough which was formally adopted by the Council, following extensive public consultation and examination by a Government Planning Inspector, in May 2006..  Proposal acknowledges that this is a sensitive site. It outlines need for retention of community uses, and clearly sets out the Green Belt and Conservation Area status as well as the need to respond to nature conservation value including TPOs. Any proposal that is not within the footprint of previously developed land must demonstrate very special circumstances.  Any development proposal that comes forward for this site will need to be in compliance with policies contained within the Local Plan.	Yes

		<u>Conservation Area</u> - 'NPPF para 134' (outlines main purpose of the green belt. To that end, the purpose of the Green Belt designation of the site within Mill Hill Conservation Area is in part to: - "check the unrestricted sprawl of large built-up areas" i.e. check the unrestricted sprawl of Mill Hill East and - "to prevent neighbouring towns merging into one another" i.e. to prevent Mill Hill East and Mill Hill Village merging with each other. Again it is simply not good enough to tack on to the end of GSS07 "Any development proposal must consider the Mill Hill Conservation Area and Green Belt designations." – because Mill Hill East is a large built up urban area and Mill Hill Conservation Area is not - as the boundary diagram below very clearly illustrates (see reference 3).		
Caroline Thomas and Bob Ganly	Site 49.	Only 50 % of the undeveloped Green Belt land here would be retained under this proposed plan. This would deprive people on the adjacent estate of a great source of pleasure. We ourselves often use the footpath beside the site when walking to the Ridgeway. The proposed development would also create much extra traffic on The Ridgeway, which has been busy with construction vehicles for many months.	See response above to Roger Tichborne	yes
Thames Water	Site 5, 6, 9 to 14, 27, and 28	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website <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> .	Proposals updated to reflect the need to consider the wastewater network.	yes
HADAS	Site 5	Add: CDH08 Add: This large development site should be the subject of an archaeological assessment.	Agreed	Yes
NHS Property Services	Site 5	Potential development of this site for residential-led development does not mean that it will require current occupiers to leave the site or will force any diminution of services. We assume that the reference to "25% hospital continuing in use" should refer to the site area rather than hospital floorspace. Site 5 describes that Colindale station is within approximately ½ km of the site. This should be amended to refer to Burnt Oak station. Whilst it is noted that the site has an indicative residential capacity of 800 dwellings, it is important that flexibility is retained in this figure until further feasibility work is undertaken in relation to viability. NHS Property Services is currently undertaking this work and will share it with the Council at the earliest opportunity.	Proposal revised. The number of units stated is indicative only – proposals must demonstrate a suitable quantum of development that meet design and housing requirements.	Yes
Elizabeth Silver	Site 5	Change to be made: Proposed use: Retain spare site area for future expansion of hospital in view of increase in population in Barnet. No residential capacity. Barnet's growth will represent unsustainable development unless plans are in place for spare capacity for healthcare and hospital facilities.	The borough has a statutory duty to plan for minimum housing targets set out in the London Plan	No
Mayor of London	Site 5	Welcome optimising development on this site and the development of the car park	The Council welcomes this support. Our approach to redevelopment of car parking is set out and justified through GSS12	No
Environment Agency	Site 5	Site description needs to include that the majority of the site is in Flood Zone 2, in addition to the third of site being within Flood Zone 3a. There is also Flood Zone 3b on site, constrained to the river corridor of Silk Stream main river. If the site passes the Sequential Test for the Local Plan, a Level 2 SFRA needs to inform the planning considerations for this site, specifically flood risk mitigation measures required. The sequential approach should be applied on site to ensure the more vulnerable uses are located in areas of lowest flood risk within the site. Should mention the opportunity to remove obsolete weirs at the confluence of the Silk Stream and Deans Brook in northern part of site. The site requirements should stipulate any tall building should be located away from Silk Stream main river.	Proposal revised.	Yes
Former MHNF	Site 50	Site 50 is a new to us, and we have not had time to evaluate its potential. We understand it is owned currently by TFL and is part of the old disused exit off the M1 where extensive fly-tipping recently	Opportunity to comment on the soundness of this proposal at Reg 19	No

		occurred. We would resist any development on this land locked site that would reduce the opportunity to improve the transport infrastructure between Mill Hill East and Mill Hill Broadway as part of this site included the old LNER railway line, and further developments over this old line, and notably under the spare arch of Bunns Bridge over the A1, are to be strongly discouraged.		
CPRE	Site 50	Site suffers from poor air quality and is already densely developed. Any development must not negatively affect current residents. There must be good open space provision within any redevelopment	Site is vacant. Policy ECC02 addresses air quality issues, including requirement for Air Quality Assessments and appropriate mitigation.	No
TfL CD	Site 50	Requirement to preserve mature trees might inhibit optimising housing delivery and text should be reworded: " <i>Preservation of <b>any high quality</b> mature trees <b>or mitigation for removal</b> is required.</i> " This site is likely to be marketed through the GLA's small sites programme in 2020 - the Development timeframe should therefore be corrected from 11 – 15 years to within five years.	Proposal revised	Yes
Leathersellers (DP9)	Site 51	Site 51 is within the ownership of the Leathersellers Company. The principles of a residential-led mixed use redevelopment are strongly supported. The local heritage assets are noted along with the Site of Borough Importance for Nature Conservation. The timescales for redevelopment are likely to be close to those in the draft document. One important point to note is that the small area to the south east made up of a terrace of lock-up style single storey garages with some open land behind which have been omitted from the allocations. We would request that this area is added in for completeness.	We welcome this support. Boundaries cannot be revised at this stage. However this does not preclude this small site coming forward as part of a future planning proposal.	Yes
Barnet Society	Site 52	Object to the quantity of units proposed on the grounds of overdevelopment and its damaging impact on both New Barnet's civic realm and the residential Lyonsdown Road.	Shaping the future development of Kingmaker House through the Local Plan is the most appropriate way to get positive outcomes for New Barnet Town Centre	No
HADAS	Site 53	Add: This site abuts an APA and as a major site should be subject to an archaeological assessment.	Agreed	Yes
Susan Solomon	Site 53	I live in the Northway House development in Whetstone. In fact I have lived in Whetstone for 57 years, as well as my parents and grandparents. We have seen many good changes over the years. I am saddened to hear that you plan to utilise the green space for this development. Please don't cut the trees down to make way for this huge building project. Of course, you can't stop Michael Gerson and A1 storage selling their land to developers, but you have it in your power to permit planning only to their land, and thus save the green space ie. forest area. You already gave permission a few years ago for a large development to be built in St. Margaret's Avenue, whetstone. The whole area has been obliterated of all the trees to make way for this development. The natural forest has been decimated. Please do not permit this development in our green natural forest space and save this precious green land for our future generations to come.	Any future proposal will take into consideration the need to protect mature trees within the site, and the adjoining Green Belt to the west and north and the Site of Borough Importance for Nature Conservation along the western site boundary.	No
CPRE	Site 53	Parts of the site are heavily wooded and these should be protected. Any development should not impact negatively on the adjoining Green Belt, which, as per ECC05 in the Reg18 document, should be protected and enhanced in line with the NPPF.	Any future proposal will take into consideration the need to protect mature trees within the site, and the adjoining Green Belt to the west and north.	No
TfL	Site 53	In line with the Council's ambition to help deliver an enhanced Northern line service in future, we strongly suggest protecting land for transport use at Allum Way (Site no. 53). We would very strongly support that: all the Planston land and some of the A1 Dairies retain designation as industrial land and are only brought forward for development if it can be done so in a manner that safeguards future transport operations. We are keen to continue working with the Council to ensure efficient operation of the railway and to identify and protect opportunities to enhance capacity in the future while supporting the Council to meet the borough's housing need.	Proposal revised to reflect change in TfL operational requirements	Yes
TfL CD	Site 53	TfL owns substantial part of the site, including station car park and warehousing to the north – see the 2017 'call for sites' submission. .TfL / London Underground may now need to retain this land for operational purposes, to serve a future Northern Line upgrade, and therefore cannot commit to promoting residential development at this point in time. The site allocation should reflect the likely requirement for TfL land to return to operational use, potentially also necessitating the acquisition of	Proposal revised to reflect change in TfL operational requirements	Yes

		some adjacent land - 20% mixed uses would not be adequate. Potential for mixed development with residential above operational structures could be investigated.		
Antony Laiker	Site 53	I wanted to express my strong disagreement about much of what I see in this document. In particular the plans for Site 53, very close to where I live. You should not be able to take away the green space that we have. We are meant to be conserving green areas not getting rid of them on a massive scale as proposed in these plans. Council has previously given permission for development of a site on St Margarets Avenue to build flats which is now derelict. All those trees gone and now a half built eyesore and monstrosity remains. If Planning are prepared to give such permissions then they should have confirmation that the developers have the financial ability to complete the work. I can assure you that a very strong campaign will be mounted by residents against Site 53 plans aided by Theresa Villiers MP. The scale of the proposal takes no account of the lack of infrastructure to cope with such expansion. The area is already overbuilt with several new developments still to be (fully) occupied.	With good access to public transport and town centre functions this site represents an opportunity for good growth. Any future proposal will take into consideration the need to protect mature trees within the site, and the adjoining Green Belt to the west and north and the Site of Borough Importance for Nature Conservation along the western site boundary.	No
Theresa Villiers	Site 53	Already traffic and access issues around Whetstone High Road.	It is considered that the development of this site presents an opportunity to improve these issues. More detailed work will be required for future proposals on Site 53.	No
HADAS	Site 54	Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.	Agreed	Yes
Thames Water	Site 55	There are Thames Water easements running through this site.	Proposal revised	Yes
Dr P. M. Ashbridge	Site 55	Re-assessment and re-provision of public car parking is proposed for this site if part of the existing car park is converted to residential. But care needs to be taken to retain the present restricted free parking at the entrance to Woodside Grange Road, where parking is at present prohibited 2-3 p.m. Mon.-Fri. This restriction prevents all-day commuter parking in this small area and is helpful for parents of the adjoining school, and for others not wishing to drive into central London congestion for short visits, study purposes, etc.	Initial planning considerations refers to the need to assess public car parking requirements and re-provide as necessary.	No
TfL CD	Site 55	This site could come forward within the five- year timescale. TfL is unlikely to re-provide car parking for station users, except for people with disabilities. The final sentence should be reworded: " <i>Public car parking requirements should be assessed and <b>mitigation provided to encourage the use of public transport and active modes</b> re-provide as needed.</i> "	Maintain timescale at 5-10 years unless further evidence of earlier development is available. Our approach to redevelopment of car parking is set out and justified through GSS12	No
Finchley Society	Site 55	Nothing should even be considered for Site no. 55 until that approved for Site no. 56 been completed and its effect on the setting of the historic and locally-listed Woodside Park Station has been assessed. Any development of Site 55 would have to be low-rise to retain some openness. Reducing the number of spaces for car parking must not be done lightly, and care must be taken to retain the present restricted free parking at the entrance to Woodside Grange Road, where parking is at present prohibited from 2 to 3 p.m. Monday-Friday; this restriction prevents all-day commuter parking in this small area and is very helpful to parents (of the adjoining school) and others	Proposal revised	Yes
CPRE	Site 56	This is a classic wooded area adjacent to Underground. While it is not designated it provides benefits for nature conservation and should be retained as vital habitat.	Proposal revised to reflect planning consent	Yes
TfL CD	Site 56	Council has resolved to grant planning permission for redevelopment of southern part of site (ref: 19/4293/FUL). Land to north of Station Approach is a longer term development opportunity, dependant on provision of satisfactory access for pedestrians, cyclists and vehicles. This may require significant redesign of one of the entrances to the western side of the bridge link at the station.	Proposal revised to reflect planning consent	Yes
Finchley Society	Site 56	A rather domineering redevelopment has now been approved for this site.	Proposal revised to reflect planning consent	Yes
Thames Water	Site 57	A critical trunk sewer runs through/close to this site which would need to be considered.	Proposal revised.	Yes
Finchley Society	Site 57	This area is a key element in the North Finchley Town Centre strategy. The section of Ballards Lane in question should be converted for pedestrian use as part of the restructuring of Tally Ho Corner. The development must fit with that vision, and not in any way pre-empt decisions on traffic flow.	This proposal reflects what was agreed through the North Finchley SPD	No

Dr P. M. Ashbridge	Site 57	Any proposals for closing or restricting traffic along this short section of Ballards Lane on the west side of the Tally Ho triangle would greatly worsen traffic congestion along the east (High Road) side of the triangle.	This proposal reflects what was agreed through the North Finchley SPD	No
Caroline Thomas and Bob Ganly	Site 58	Our worry here is the loss of public car parking, of which there is already too little in North Finchley.	Our approach to redevelopment of car parking is set out and justified through GSS12	No
Mayor of London	Site 58	Welcome the redevelopment of the car park. The re-provision of car parking should not be required in this town centre location	Our approach to redevelopment of car parking is set out and justified through GSS12	No
Client interested in North Finchley TC	Site 58	Has indicative residential capacity of 132 units and that proposals “ <i>should include retail and office uses with residential above.</i> ” Para 6.63 of SPD states that this site should “ <i>retain or reprovide existing retail frontages and provide residential units or other town centre uses above.</i> ” Our client questions why the proposed uses are limited to retail, residential and office, and suggests that wider reference to ‘ <i>other main town centre uses</i> ’ should be added to policy wording as per the SPD, NPPF and London Plan. It is also unclear why it is considered necessary to include the restriction of ‘ <i>30% mixed uses</i> ’ within proposed site allocation wording. Our client considers this to be overly restrictive and that it could prevent the delivery of sustainable development within North Finchley as required by the SPD. We request that this reference is removed. In addition, in order for the proposed site allocations to be in line with NPPF, London Plan and other Local Plan polices which seek to optimise housing density, the indicative residential capacity figures should be identified as minimum targets. This is especially important given my client’s capacity testing suggests this site can accommodate more than the 132 units identified. Finally, my client considers that there would be merit in extending the site allocation to include all properties fronting onto High Road between Percy Road and Lodge Lane which will ensure that potential of site is optimised.	Proposal 58 has been reviewed in order to be consistent with existing SPD.	Yes
Finchley Society	Site 58	The current office and mixed-use buildings are undistinguished but cover quite a large area. Consideration should be given to a low-carbon development, in which the existing structures are not demolished but integrated into a larger development that surrounds them, including adding one or more additional storeys. Demolition of buildings that can be refurbished is now seen as incompatible with minimising carbon emissions over the lifetime of buildings.	This proposal reflects what was agreed through the North Finchley SPD	No
HADAS	Site 59	Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.	Amend	Yes
Finchley Society	Site 59	Central House is widely regarded as an over-sized eyesore. Its replacement by a building that is no taller would be desirable, even though this may not be the lowest carbon option (compared to refurbishment and reuse). Any replacement should meet highest standards of design and energy efficiency. Integration with the proposed redevelopment of TfL land around Finchley Central Station is crucial. The replacement building should be no taller than the current building, so as to prevent this relatively small and narrow town centre from becoming an impenetrable mass of tall and very tall buildings.	Finchley Central was identified in the 2012 Local Plan as a location where tall buildings may be supported	No
HADAS	Site 6	Add: This large development site should be the subject of an archaeological assessment.	Agreed	Yes
CPRE	Site 6	Site encompasses a Site of Importance for Nature Conservation (SINC) which the council should make sure is retained.	Retention of the SINC is highlighted	Yes
Environment Agency	Site 6	The SFRA shows that a significant proportion of the site lies within Flood Zone 3b which is functional floodplain (the zone comprising land where water has to flow or be stored in times of flood). The 1 in 20 year flood extent is normally the basis for identifying areas of functional floodplain, and indicates an area subject to more frequent/regular flooding than the 1 in 100 year typically indicative of Flood Zone 3a. Residential development is classed as a more vulnerable use and should not be permitted or allocated in Flood Zone 3b (PPG Table 3). Expected this site to be discounted if the Sequential Test is appropriately applied. Very likely to object in principle to the site being allocated for housing or to a planning application proposing housing in Flood Zone 3b on this site. If there are other sites at a lower	Site has been subject to Level 2 SFRA and a sequential test.	yes

		risk of flooding with similar capacity that were discounted during the earlier Site Selection process than these should be reconsidered as part of the Sequential Test process to be undertaken. Any further consideration of this site must be made based on guidance in the Level 1 SFRA and a Level 2 SFRA.		
TfL CD	Site 6	TfL owns Burnt Oak station and a small amount of land to the rear – this should be reflected in the site allocation. TfL will require development on this site to improve interchange and contribute towards achieving station step free access (works are due to start in Winter 2020), capacity, access and facilities improvements	Updated to reflect TfL ownership and need to improve the station interchange and potentially contribute towards step-free access.	Yes
Finchley Society	Site 60	In line with some other sites in the Local Plan, redevelopment of this site should be approached with considerable caution. This is a relatively modern office block with a well-maintained exterior. What justification is there for demolishing it to build new offices? The climate impact of such demolition and new construction is usually unacceptable when compared with refurbishment and reuse. The existing buildings could be integrated into a new development which could incorporate additional mixed-use buildings. Given the need to focus on the climate emergency, previous policies in which demolition was the default for site redevelopment should be changed to an emphasis on refurbishment and reuse of existing structures. Whatever is built at this location should be no taller than the current building, to avoid turning North Finchley into a mass of tall and very tall buildings.	This proposal reflects what was agreed through the North Finchley SPD	No
Thames Water	Site 61	A critical trunk sewer runs through/close to this site which would need to be considered. There are TW easements running through this site.	Proposal revised	Yes
TfL CD	Site 61	TfL has leasehold interests at this site related to the bus station - TfL Spatial Planning will comment.	TfL Spatial Planning did not comment on this site in their response to the Reg 18. Their feedback was reflected in the North Finchley SPD	No
Mayor of London	Site 61	The re-provision of car parking should not be required in this town centre location	Our approach to redevelopment of car parking is set out and justified through GSS12	No
Client interested in North Finchley TC (Quod)	Site 61	Our client would also like to request that the identified indicative residential capacity of 281 units is set as a minimum target, and that the reference to “30% mixed uses” is removed. In respect of the residential capacity of the site, my client’s testing undertaken to date suggests that a site can suitably accommodate significantly more units which is consistent with London Plan and NPPF requirements to optimise density in town centre locations, well served by public transport accessibility.	The indicative residential capacity is provided to show potential housing deliverable at a site but is not intended to constrain proposals which can come forward with a lower or higher figure. The methodology for calculating residential capacity is set out in the Schedule of Site Proposals and has been carried out on a consistent basis between sites. The description of non-residential uses has been clarified.	Yes
HADAS	Site 62	Site 62 Tesco Finchley Add: The site lies within an Archaeological Priority Area (APA) and will require assessment.	Amend	Yes
Finchley Society	Site 62	Demolition and reconstruction of this building would be incompatible with low-carbon development. The existing building should be retained, with one or more floors added on top. There is no reason to demolish such a relatively modern building which is of acceptable design and is in relatively good condition. The site is presumably already profitably used as a supermarket and offices. The reference to the site being in a ‘tall buildings location’ is misleading; there is only one tall building in the area, namely Central House. The establishment of Finchley Central as a tall buildings centre would lead to creation of unacceptable canyon effect along this narrow stretch of Ballards Lane as successive developments match each other in heights of over 8 storeys	Finchley Central was identified in the 2012 Local Plan as a location where tall buildings may be supported	No
Mayor of London	Site 62	Welcome optimising development on this site and development of the car park. Car parking is not required in this town centre location	Our approach to redevelopment of car parking is set out and justified through GSS12	No
HADAS	Site 63	Add: The site lies on the possible route of Watling Street, a Roman Road, and should be subject to archaeological assessment.	Agreed	Yes
Finchley Society	Site 64	This incorporates all High Road frontages from junction with Friern Park’s south side to Stanhope Road. The first two or three premises (eg Café Nero, McDonalds) do not have heritage 1 <sup>st</sup> and 2 <sup>nd</sup> floor	This proposal reflects what was agreed through the North Finchley SPD	No

		facades, and could be redeveloped above for residential purposes, but in keeping with the suburban-style heights of this historic townscape. W. H. Smith, however, needs particular care, as it is one of the two bookshops in this Town Centre, being near Waterstones. Having a cluster of two bookshops is a retail asset for this town centre. The remaining 'shop-tops' in this site are locally listed; their first and second floors should be retained entirely and also not be overshadowed/dominated by new adjoining tall buildings. .		
Dr P. M. Ashbridge	Site 64	This incorporates all High Road frontages on its east side from Friern Park's south side to Stanhope Road. The first two or three (e.g. Cafe Nero, MacDonalds) do not have heritage 1st and 2nd floor facades and could perhaps be redeveloped above for residential purposes to a limited extent but in keeping with the suburban style heights of this historic townscape. The styles of the remaining "Shop-Tops" (the first/second floors) are all local heritage. They should be retained entirely and also not be overshadowed/ dominated by new adjoining tall buildings.	This proposal reflects what was agreed through the North Finchley SPD	No
Mayor of London	Site 65	Barnet should seek to replace the industrial capacity on this site, and as a minimum, the site should not be allocated so that policy E7C on non-designated industrial sites will apply to its redevelopment	There is no industrial capacity. This is a former mortuary	No
Thames Water	Site 66	A critical trunk sewer runs through/close to this site which would need to be considered.	Proposal revised	Yes
Finchley Society	Site 66	The curved Sea Rock facade at the junction of High Road and Woodhouse Road is locally listed and should be retained. It is a much-recognised landmark when approaching from Kingsway. Other frontages and buildings from Castle Road southwards and into Woodhouse Road should (i) be retained where heritage/good design is visible, and (ii) if renovated for residential use, done so at a moderate level and without tall buildings. This High Road-Kingsway-Woodhouse Road junction has two contrasting shapes at its corners - the more human and visually pleasant Sea Rock curve and Arts Depot frontage curve, and the sharp and over-dominant angles of the tall, badly-designed 'Finchley House and the 11-storey badly-designed block of flats visible behind the Arts Depot. these two tall angular misfortunes need somehow to fade into the architectural background (or disappear) rather than to be taken as a model for the future	This proposal reflects what was agreed through the North Finchley SPD. It has been updated to reflect the locally listed building	No
Dr P. M. Ashbridge	Site 66	The curved Sea Rock facade at the junction of the High Road and Woodhouse Road is on the Local List and should be retained. It is a much-recognised landmark. This junction has two contrasting shapes at its "corners" - the more human and visually pleasant Sea Rock curve and Arts Depot frontage curve, and in contrast the sharp, over-dominant angles of the tall, badly designed Finchley House and 11-storey block of flats behind the Arts Depot. Sea Rock and the Arts Depot frontage are visual "gateway" assets for the Town Centre. The extensive two red-and-white terraces extending northwards along the High Road from near the Sea Rock position are shown, in part, in the adopted SPD, page 43, with a caption: "Image 35. Buildings contributing to local character". These should of course also be retained as they are.	This proposal reflects what was agreed through the North Finchley SPD. It has been updated to reflect the locally listed building	No
Landsec (Indigo)	Site 67	Opportunity for additional parcels of land to be included as part of the wider redevelopment of the site; could include the hotel and restaurants to the north, alongside the Glebelands Indoor Bowls Club which offers the opportunity to improve existing facilities and maximise the potential of the site for housing. There have been discussions with neighbouring landowners and Landsec will continue to engage as the masterplan progresses. Opportunity to significantly increase the amount of housing proposed through the draft allocation, in addition to allowing for a greater mix of other non-residential uses. Early feasibility studies show that the site has the potential to deliver in excess of 600 homes within the current boundary. At this stage, LBB should not seek to require 40% of the site to be for the provision of mixed uses including sports and leisure, community uses and replacement parking. There should be flexibility built into the allocation and it should not be as prescriptive in order to allow the best use of land. The allocation should allow some flexibility for local services to be included in the redevelopment forming a complementary local centre to North Finchley. The stated development timeframe of 11 and 15 years into the Plan period is considered to be a conservative position: an application for redevelopment could	The housing figure on the schedule is indicative only and reflects both the low PTAL of the site and the desire to maintain leisure uses. The Council accepts retention of leisure uses at this site, with associated car parking due to the low PTAL values.  The Council seeks thriving town centres as set out in Policy TOW01. Development of new town centre uses, or a new local centre at this site, will not be supported.  Timeframe has been revised to reflect earlier delivery	Yes



		be submitted within the next 12-18 months, meaning the site could be delivered in the first five years of the Plan. Landsec is drawing up masterplan options and is committed to bringing forward the redevelopment of the site and commencing formal pre-application discussions in near future.		
LB Brent	Site 7	Western part of site faces towards LB Brent's Cricklewood Town Centre which is a Primary shopping frontage. Therefore it is recommended that any development coming forward should maintain active frontage towards the Cricklewood Broadway.LB Brent wish to be consulted on the Cricklewood Masterplan and ideally would like early engagement with local Brent councillors to occur in its development. Initial Planning considerations: Any development proposal should ensure the provision of an active ground floor frontage along Cricklewood Broadway.	Agreed. Text revised This will be reflected in our Statement of Common Ground	Yes
HADAS	Site 7	Add: This large development site should be the subject of an archaeological assessment.	Agreed	Yes
Thames Water	Sites 2,8, 30, 53, 56, 61 & 62	The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Proposals revised to reflect the potential for wastewater network capacity issues.	Yes
HADAS	Site 8	Add: This large development site should be the subject of an archaeological assessment.	Agreed	Yes
Historic England	Site 8	Does not mention the Mapesbury Conservation Area which lies to the south in neighbouring Brent. It is important to consider the cross border impacts on the historic environment from the outset. The Brent Conservation Character Appraisal should form part of the plan's evidence base, where identified key views in both the conservation areas should be mentioned specifically within the policy alongside the need to conserve their setting.	Agreed	Yes
LB Brent	Site 8	LB Brent wish to be consulted on the Cricklewood Masterplan and ideally would like early engagement with local Brent councillors to occur in its development.	We will consult with Brent on any planning framework proposals for Cricklewood This will be reflected in our Statement of Common Ground	No
HADAS	Site 9	Add: CDH08 Add: This large development site should be the subject of an archaeological assessment.	Agreed	Yes
TfL CD	Site 9	TfL would need to work with the Council and other landowners to secure provision of adequate pedestrian, cycle and vehicular access to the site. Development timeframe could be brought forward (to, say, 5-10 years) subject to securing access.	Site has been subject to Level 2 SFRA and a sequential test.	Yes
Environment Agency	Site 9	The SFRA shows the majority of the Flood Zone 3 extent is also Flood Zone 3b from the Silk Stream river. The backland location and difficult access also make the site vulnerable. Do not consider this is a sensible location to propose housing. Providing appropriate floodplain compensation would be also be major challenge. Records show that flooding from the Silk Stream occurred in this area in summer 2016 with property flooding as a result. There was also garden and road flooding in summer of 2016. The area around Colindeep Lane also regularly suffers from surface water flooding. Expected this site to be discounted if the Sequential Test is appropriately applied. Very likely to object in principle to the site being allocated for housing or to a planning application proposing housing in Flood Zone 3b on this site. If there are other sites at a lower risk of flooding with similar capacity that were discounted during the earlier Site Selection process than these should be reconsidered as part of the Sequential Test process to be undertaken. Any further consideration of this site must be made based on guidance in the Level 1 SFRA and a Level 2 SFRA.	Site has been subject to Level 2 SFRA and a sequential test.	Yes
Donato Peduzzi	Site 9	Concern and shock seeing Colindeep Lane. Precise location not clear from map but area consists of the wooded area running from the 'White Bridge' stretching along the stream bank behind Colindeep Lane properties (nos 150 - 168) behind Chalfont Court, 170-178 Colindeep Lane, Marlow Court and turning behind Sheaveshill Avenue (nos 114 to 152). Please confirm to me whether this is in fact correct or provide me with the exact mapping details. Assuming that my assessment is accurate it should be	Site has been subject to Level 2 SFRA and a sequential test. The site proposal seeks the retention and enhancement of its biodiversity including the mature trees. Any development that comes forward must reflect its location as part of a Green Chain	Yes

		removed immediately from any consideration for future development maintaining it as a Natural Conservation Area for the following points: This small stretch of woodland is the only natural piece of woodland in this area. It is a totally secluded habitat and not accessible to the general public; It is therefore a natural habitat for an extensive variety of wildlife and birds, such as woodpeckers, jays, sparrow hawks, finches, chaffinches and other breeds. Many of these species do not thrive in standard park environments and have therefore established themselves here over many years. Families of Herons and ducks also live and annually nest along this stretch of the stream; area has a large number of mature trees which provide habitat and oxygenate our air in an increasingly highly overdeveloped 'concrete jungle' neighbourhood; Within the woodland there are other deep natural water courses which are smaller offshoot tributaries running through it from the Silk Stream; There is no logical access point into the area suitable to accommodate a residential area or to allow proper and easy access for the emergency services. It is inconceivable that this wanton destruction of a natural habitat for the sake of just 138 dwellings could even be considered by the Council when there are many brownfield sites more suitable within the borough. Please leave it alone, leave it to Nature and stop any actions by TFL.	along the Silk Stream as well as the adjoining Site of Borough Importance for Nature Conservation in the design of the proposal	
Nick Burgess	Site 9	I would like to see this land protected and not built upon as it has been used as free land for over 50 years to my knowledge it is a wildlife corridor.	See response above to Donato Peduzzi	Yes
CPRE	Site 9	This site would result in loss of green space in a densely developed area. Green space should be retained to improve open space access for the growing population.	See response above to Donato Peduzzi	No
Sport England	Sites 1 & 2	Sport England objects to any sports facilities that might be lost, for example Church Farm Leisure Centre. Also proposals for new sports facilities, such as a replacement sports pitch at North London Business Park, should be in line with strategic identified needs and not be vague in the type of playing pitch(es) required. It is, therefore, questionable if this new pitch is in line with identified needs.	Proposal for Site 1 highlights re-provision in new leisure centre. Site 2 has been updated to reflect the planning consent for NLBP	No
Wade Miller-Knight	Sites 11 & 12	Object to the proposed suitability for tall buildings (out of existing context) and higher density than other sites (such as 46 and 50) – noting character is protected better in Burnt Oak, East Finchley, Finchley Golders Green and Hendon.	These sites were originally identified as development opportunities in the Colindale Area Action Plan (2011). CDH04 identifies locations that may be suitable for tall buildings. This includes the Colindale Growth Area and the A5 Major Thoroughfare.	No
Donato Peduzzi	Sites 11,12 & 13	Very surprised to see the additional sites for redevelopment in Colindeep Lane namely McDonalds (12), KFC (11) and the Public Health England unit (Colindale Avenue)(13). Colindale is undergoing a huge transformation - current developments around Colindale Station will put a huge strain on resources such as local transport, traffic, health, childcare and youth centre facilities. It seems that Colindale together with the Sainsbury development that is underway is reaching saturation point. Additional housing/flats along Colindeep Lane will create even more constant bottlenecks and the notion of a car free or car reduced environment is a pipe dream. Just building upwards will create social problems for future generations. However, redevelopment of these already developed sites is inevitable but strongly suggest strict height restrictions to the tower blocks built. One urgent action needed is to make Colindeep Lane a double yellow line zone - fast reaching the point of constant jams preventing buses/ambulances/lorries from freely travelling along the road. This area has always been designated a flood risk. In view of current weather patterns and the recent severe flooding across the UK this risk would increase further with any housing development. Woods act as a natural sponge for excess rainwater.	Sites 11 and 12 were previously identified in the Colindale Area Action Plan – adopted in 2011. Public Health England plan to vacate their site within the lifetime of the Local Plan.  Development proposals will have to address constraints such as flood risk from the Silk Stream. In terms of traffic congestion the Local Plan will expect proposals to reduce car usage and through improvements to infrastructure increase walking and cycling as a mode of transport.  The Infrastructure Delivery Plan will address provision of health and community facilities.	No
New Barnet Community Association	Sites 16 & 22	A number of sites in New and East Barnet could cause planning blight as owners will not want to invest with potential for redevelopment. Designation as TC is contributing to development that is not suitable for the area.	The London Plan identifies New Barnet as a town centre and sets the framework for the Local Plan. The status of sites previously highlighted in the New Barnet Town Centre Framework has been elevated by designation in the Local Plan. This should help spur development.	No

Patricia Prichard	Sites 23 & 24	<p>I would also oppose the inclusion of the site of the former Bobath centre. There is a desperate need to protect the remaining quality of life for Londoners and to protect the environment which is apparently being ignored in policy. I should like to express very strong opposition to the proposal to include the car parking site at East Finchley as potentially available for development. The persistent erosion of quality of life for Londoners exemplified by this sort of irrational and irresponsible proposal is highly damaging. This site is in active use and remains vital to the local community and commuters. London has been transformed in the last thirty years or so from a very liveable city into one in which it is no longer nearly as pleasant or desirable to live. Enough is already far too much. The outer suburbs of London still depend on car use to a very significant extent and the removal of important parking spaces like this one would be completely unacceptable. East Finchley has already been much spoilt by a series of unsuitable overdevelopments which have had an extremely adverse impact on the local environment and residential amenity. There appears to be a fundamental failure by policy makers to appreciate that you cannot pay lip service to climate change, declare a climate emergency and then carry on with massive amounts of house building – concrete and cement are huge contributors to carbon footprint. Development is enormously destructive to the habitat and local ecology and to the mental health and well-being of existing residents, even in cities. There is a presupposition being made here that the density of London needs to go up still further and increase exponentially which is rash and ill founded. Supply of land is finite not an infinite resource.</p>	<p>By managing growth the Local Plan can help retain the qualities that attract people to live and stay in the Borough.</p> <p>East Finchley Station lies partly within, and partly adjoining, East Finchley Town Centre and is highly accessible by public transport. It is therefore appropriate to promote sustainable development that serves the town centre and promotes housing delivery. This includes assessing public car parking requirements must be assessed and re-provided as needed. Mitigating climate change is a fundamental part of this Local Plan.</p> <p>Through the Local Plan we can ensure that we build more sustainably, making more efficient use of land, accommodating the needs of existing residents while considering the requirements of future generations.</p>	Yes
Finchley Society	Sites 23-26	<p>These 4 sites should be considered together and a strategic masterplan prepared to address the High Road and Station entrance and land around and both sides of the High Road, forming as it does a major entrance to East Finchley. There are significant listed buildings both on these sites and close by, the Phoenix Cinema, giving historical importance to this area. <b>Site 23</b> The Bobath Centre is a listed building and this includes its site. The listed building fronting onto East End Road has already been developed as a nursery, with a portion of the site to the south fenced off, presumably for sale as housing opportunity. This site has a key pedestrian route through to the station car park site and thus links to site 24 and the transport links of bus and tube. There are significant changes in level at the west and south boundaries of the site. <b>Site 24</b> The notion of separating the station use from potential residential use is welcomed. The listed East Finchley Station is an important building at the entrance to East Finchley and views of the station building, the iconic statue of the Archer, and the bridge, viewed from both sides are key and important to the townscape. The relationship of the station entrance to the bus stops, entrance to Cherry Tree Wood across the road and the development of site 26 opposite must all be considered together. Improvements to the public realm to greatly improve pedestrian movement across the road in both directions, access and environment at the bus stops, and pedestrian and cyclist movement to the Cinema and shops on the High Road <b>Site 25</b> The existing building is significant in the group of tube station buildings and has an embodied energy in the form of the substantial brick building. This site is opposite the notoriously difficult junction with Bishops Avenue and has a fine view of the listed station building at high level, the statue and the bridge. The opportunity should be taken when developing this site of substantially improving the pedestrian and cycling experience at the junction with Bishops Avenue and signalling the gateway to East Finchley <b>Site 26</b> Park House. The red boundary on the map has been drawn incorrectly and includes the site of Valona House to the north, currently not in council ownership and already having received permission for development. Park House itself is set back from the road and has an area of green to the front with fine trees on it. This leads to the entrance to Cherry Tree Wood. The current building line should be respected and retained, and the green space to the front protected and maintained and improved. This should be linked to the entrance to Cherry Tree Wood and make the whole contribute positively to the street scene. In the first instance the existing building should be considered for refurbishment, in line with environmental policy.</p>	<p>Although there are no plans at present to progress an area framework for East Finchley Town Centre this could be considered further.</p> <p>Sites 23 to 25 – proposals updated Site 26 – Boundaries revised and proposal updated</p>	Yes

TfL	Sites 24, 30, 44, 47, 55	As set out above, re-provision of parking should be minimised, consider the impacts of re-providing parking and justifiable in its own terms, not due to its prior availability. Any assessment of 'need' should take into account that the availability of parking creates demand for it and the extent of bus alternatives for accessing the line in question. Planning for a sustainable London must be based on demand management rather than predict and provide.	Our approach to redevelopment of car parking is set out and justified through GSS12	No
TfL CD	Sites 27 & 28	<p>There is a small amount of TfL-owned land within Site No. 27 and the ownership section should be updated to reflect this. TfL CD has been working with the owner of the Broadwalk Shopping Centre, whose landholdings comprise the majority of Site No.27, to look at options for a comprehensive development across both sites and have undertaken an initial feasibility study. Given the importance of these 2 sites they should be incorporated into one site allocation. Must acknowledge the need to retain operational transport facilities and land including the bus station, stands, LU station and sidings. However, there may be scope to explore relocating eg. the bus station and / or stands if it would improve interchange, access and transport operations. Using the density matrix from the London Plan (2016) is no longer considered the best method and has been removed from the Draft NLP. In addition the site area included in the site allocations are wider than those that have been considered as part of the feasibility exercise we have undertaken, and it would be useful to understand what assumptions have been made to reach the figures in the site allocations.</p> <p>It is not clear how the 'Proposed Use type/s' is calculated; it is suggested that for more complex and strategic sites the reference to the % is removed and wording is updated along the following lines:  <del>"Proposed use type/s: residential with 30% mixed uses (transport, retail, office and community)</del>  <b><u>transport and town centre uses to strengthen the high street including retail; food and beverage; leisure; office; community and public realm / open space.</u></b></p> <p>Description of surrounding context should also refer to other nearby taller buildings on the high street including the consented Premier Place (19 storeys) and Premier House (14 storeys). For clarity the following amendment is suggested: <del>"Edgware Town Centre Framework (2013) provides further guidance</del> <b><u>which will be superseded by further guidance to be provided in the emerging Edgware Town Centre SPD once this is adopted.</u></b>"</p>	<p>Site 27 updated to reflect TfL element of ownership.</p> <p>The Council seeks the coordinated redevelopment of both sites and is preparing the Edgware SPD to support this approach. The Council will consult with the major landowners on the potential or otherwise to take this forward as a single site.</p> <p>The density matrix is a widely-recognised approach to assessing the potential quantum of housing units. Calculations were run on the basis of entire site areas – the Council will consult further with TfL on whether to include the track and station areas within the envelope suitable for residential and mixed-use development.</p> <p>Providing a percentage for non-residential floorspace gives a broad quantum on which uses the Council would like to come forward.</p> <p>Text updated to provide more detail on other uses and to include references to Premier House and Premier Place as well as highlighting that the SPD will supersede the 2013 Framework.</p>	Yes
Milan Shah	Sites 40 & 41	I wish to raise concern over the proposed new build of student accommodation in the area The Meritage Centre, PDSA, the garages on Prince of Wales Close and the Fuller Street car park. The local parking situation is already very strained especially during normal university hours (during the day Mon to Fri). There are often students forming queues with their cars for parking spots in this area which makes it extremely difficult for residents to park their car. The parking areas that are controlled by private company do not enforce parking restrictions and this causes a lot of problems. If the new build does go ahead, then serious thought must be taken into the parking situation to ensure there is enough parking for all residents.	The Local Plan at Chapter 11 sets out how a CPZ could be introduced. This would be in consultation with residents, to ensure existing residents have access to parking in their own area.	Yes
LB Barnet Estates (GL Hearn)	Sites 40 & 41	On behalf of Middlesex University and LB Barnet ESA Architecture estimate that both Site Nos. 40 and 41 have a combined indicative capacity for 235 student rooms.	Proposals revised	Yes
Sharon Rind	Sites 40 & 41	Expansion of Middlesex university student accommodation under your plan, of which I am vehemently opposed to, namely: Sites 40 and 41 The redevelopment of The Meritage Centre, PDSA, garages and Fuller Street Car Park to be made into student accommodation. Middlesex University is ruining what used to be a beautiful area. The students take up parking spaces meant for residents in Prince of Wales Close, NW4, they are aggressive and abusive, they throw litter everywhere and can be seen taking drugs. As Prince of Wales Close has no CPZ (which the residents are desperately fighting to get), the students drive in to University and park in that street-therefore Barnet Council, by not implementing CPZ, is encouraging more traffic in the area when these students could access the 5 bus routes,	See response above to Milan Shah	Yes

		Underground and Overground trains that are all around the University. Local residents need to be able to park in their street, as it is there are not enough parking spaces for all the local residents-we need the garages land and Fuller Street Car Park, not more students in student accommodation.		
Trevor Layne	Sites 40 & 41	I am shocked and somewhat in disbelief that Barnet Council would see it fit\appropriate to put existing and long term residents last in favour of redevelopments for Middlesex University. I wish to register my <b>STRONG OBJECTION</b> to this. The last thing this area needs is more student accommodation. Students are abusive and have little regard for residents and the area in general. In nearly 20 years of living in the area\Prince of Wales Close Estate, particularly in the last couple of years, I have seen the demise of area. Barnet clearly no longer cares. There is an increase in rubbish dumped all around, drug deals being visibly made\conducted around by the garages, graffiti, vandalism of building access doors\windows, the list goes on. Where will these additional students park? Residents are paying rents on garages they cannot use for student cars in front of them. We struggle as residents now to park our cars as it is. We raise the issue and just receive excuse after excuse from Barnet as to why there is no current parking scheme in place. Talk about infrastructure and finance doesn't appear to be an issue for this proposed redevelopment! Does Barnet really care so little about residents????	The Burroughs and Middlesex University SPD will create a more focused planning framework for the area allowing for the issues raised to be addressed in more detail	Yes
John O'Brien Kathleen O'Brien	Sites 40 & 41	We are writing to object about the plans to redevelop the Meritage Centre, the PDSA, the garages on Prince of Wales Close (NW4 4QN) and the Fuller Street car park into student accommodation for the University of Middlesex. The increasing presence of the University is a blight on our community, as unfortunately a number of students are abusive, leave litter and (in some cases) take, exchange and deal drugs in the recesses of the buildings. We have always been diligent in paying our Council Taxes and making positive contributions to the local community and economy and now we find that it is becoming impossible to park anywhere near to our home (10 Prince of Wales Close). This matters, as we are both 78 years and many of our neighbours also fall into the elderly age bracket. A far, far better solution would be (as we and others have been keen to campaign for) would be CPZ. We hope you move towards this as soon as possible and not be in thrall to the University.	See response above to Milan Shah	Yes
Madeline Lester	Sites 40 & 41	I have received notification with regard to the above and wish to say I strongly object to these proposals. I live at No.20 Thornbury Prince of Wales Close and we have enough trouble what with car parking problems, which I might add we have been talking about for nearly two years, any further extension here is going to cause immense bother to all who live here.	See response above to Milan Shah	Yes
Barbara Lowe, Martha Lowe	Sites 40 & 41	The proposed development of Student Accommodation for Middlesex University. You have delayed our petition for CPZ. We already have students parking on our grassed areas, blocking our cars, we have parents dropping off children for school, nursery, children walking and loitering on the estate to get to school. Traffic moving at speed where it is unsafe. <i>We need CPZ not Further student accommodations.</i>	See response above to Milan Shah	Yes
Mark Josephs	Sites 40 & 41	Strongly oppose any development plans for parking which are being discussed regarding Middlesex university students who are abusive litter throwing drug users. As it is ,they take residents parking spaces ,with no regard to people who actually live on the estate. When they are confronted by residents they become aggressive and just laugh .The university should be held responsible for the already impossible situation which the residents find themselves in and most certainly not be discussing any further parking development for students within the prince of Wales close all the parking for the students should be on student grounds not residents grounds .	See response above to Milan Shah	Yes
National Grid	Sites 5, 11, 12, 14, 27, 30, 46 & 49	National Grid assets have been identified a number of sites that are crossed by or are close to proposed development sites. Asset locations are shown on plans for these 8 sites	Protection of National Grid assets will be ensured during any development of these sites.	No

Woodside Grove Management Company Ltd	Sites 55 and 56	The sites are in very close proximity to the back gardens of family houses and apartments' in the area as well as to the London underground (Northern line) train tracks. A more detailed plan is needed to achieve well designed, high quality streets, spaces, public realm and buildings; and seek to achieve the highest possible standards in sustainable design. Land available round the station should be considered for the benefit of all the community and certainly existing residents and not using it to meet a housing metric for the whole country. The sites should benefit all the community, with facilities such as nursery schools, retail, bicycle storage, playground and garden ground for children, etc. In the past 10 years there have been many residential developments in the North Finchley area. This is creating a serious burden on the already pressurised local infrastructure – on Woodside Park tube station, on the drainage, sewage, traffic congestion, density levels, and the environment. TFL and the planning authority should impose planning conditions on any development on TFL land to ensure the main objectives for the community are captured Removing car parking but continuing to attract additional vehicular movement to the area is highly undesirable; if vehicular movement is to be retained then appropriate parking under any development should be required. The Planning Committee has already considered Site 56 in the Draft Local Plan. It is unclear to many members of the public why this site was even considered prior to the obligation to consult on all sites in the Local Plan. The question must be why that applicant was allowed to submit plans for this site prior to the consultation process.	Identification of this site in the Local Plan demonstrates that the Council considers it suitable for development. Proposals must demonstrate compliance with good design policy requirements, including distancing to neighbouring properties.  Both sites are highly accessible for public transport and local services, and provide sustainable locations for residential development.  Financial contributions towards infrastructure provision are required to mitigate the impact of development.  The high PTAL levels reduce the need for car use. The Local Plan supports more sustainable transport modes to reduce car use. Controlled Parking Zones (CPZs) can be established and enforced by the Council to control on-road parking.	No
Mirit Ehrenstein	Sites 55, 56 & 57	Residential developments in areas which are already heavily residential. Concerns expressed with the proposed development of Site No. 56 when it was the subject of a separate planning application still apply to this site and the others. Streets have no capacity for additional parking or any other facilities. Of particular concern is the proposal to build on the current Woodside Park car park. Commuters will use even more residential roads around to park their cars, increasing the congestion in the area. Road is already almost impassable due to the building works, and once completed, will have to absorb the additional traffic they will bring. Two developments currently taking place in Holden Road, just by Garden Court, are still prohibitively expensive, and too many units are being squeezed into the spaces.	The sites are highly accessible for public transport and local services, providing sustainable locations for residential development. The high PTAL levels reduce the need for car use. The Local Plan supports more sustainable transport modes to reduce car use. Controlled Parking Zones (CPZs) can be established and enforced by the Council to control on-road parking. Although Local Plan policy sets out affordable housing requirements it cannot control the market price of new build housing.	No
LB Harrow	Sites, 5,6, 27 & 28	Allocated sites would seek to deliver a significant amount of development, which would be in close proximity to boundary with LB Harrow. Harrow does not object to the sites, given pressures to deliver sufficient amount of housing and employment floorspace. Furthermore, the sites are located within, or at least adjacent to town centres, or along the A5 which has been identified (within the LB Barnet Plan) as a sustainable location for more intensive development. LB Harrow agree that such locations are ideal for more intensive developments, ensuring that the most efficient use of the sites are achieved and delivered. Notwithstanding this, the quantum of development set out in the allocations is likely to have some impact on LB Harrow & its residents. Whilst it is acknowledge consultation on development at these sites would occur at planning application stage, LB Harrow would welcome further discussions on the redevelopment of these allocated sites.	We welcome this support from LB Harrow. This will be reflected in our Statement of Common Ground	No
Roger Chapman	New Site	Add new site 68 to Annex 1 – Schedule of Site Proposals Wastelands	The Council refers to its previous response on Barnet Wastelands	No
London Diocesan Fund (Iceni Projects)	Unallocated Land	Mount House School is a highly successful independent school which provides additional educational choice to the residents of the Borough. It has aspirations to expand their existing facilities and we consider the adjoining Diocese land provides an ideal opportunity to achieve this. The provision of additional sporting facilities is a key aim of the school and these could be made available to the local community and help meet some of the shortfalls in leisure facilities identified in the Council's Indoor Sports and Recreation Facilities Study. For example, the School aspires to deliver a new sports hall and	The extensive window for submission of proposal sites has now closed and the Local Plan is taking forward those sites highlighted in the Reg 18 Schedule of Proposals. Barnet has the capacity to deliver a minimum of 35,460 new homes from 2021 to 2036. This is	No

		swimming pool which are also identified requirements within the Indoor Sports and Recreation Facilities Study. By removing the site from the Green Belt and allocating it for these purposes the Council could meet its twin objectives of enhancing its educational offer to parents and increasing community access to leisure and recreation facilities for which there is a shortfall. In addition to educational provision and leisure facilities on site, we consider that the wider site is suitable for delivering much needed family housing. The site is in a broadly sustainable location; does not contribute towards the five aims of the Green Belt set out within the National Planning Policy Framework (NPPF) and is located within an area of compatible land uses. As a minimum, a degree of cross-subsidy will be required to deliver the expanded education and leisure facilities at Manor House School. This would be delivered by residential development on the site which, as we have set out above, would be an appropriate and suitable location for new housing.	expressed in Policy GSS01 and subsequent policies GSS02-GSS12 demonstrate how we will deliver this. The Council has conducted a Green Belt and MOL Review which demonstrates no justification for making significant revisions to existing Green Belt and MOL boundaries.	
LB Barnet Estates	Unallocated Land	Middlesex University and LB Barnet seek the allocation of 1-3 Burroughs Parade for a student housing led mixed use scheme as part of its drive to improve the quantity and quality of student accommodation within the vicinity of the Hendon Campus. This site is owned by the University and measures 792 sqm with an indicative site capacity of 61 student rooms.	The extensive window for submission of proposal sites has now closed and the Local Plan is taking forward those sites highlighted in the Reg 18 Schedule of Proposals. This does not preclude this site coming forward for redevelopment in line with the policy framework outlined in this Plan.	No
LB Barnet Estates	Unallocated Land	Middlesex University and LB Barnet seek the allocation of 13-21 Church End for a student housing scheme as part of its drive to improve the quantity and quality of student accommodation within the vicinity of the Hendon Campus. The capacity study provide by ESA Architecture indicates that this site could accommodate 41 student beds.	See response above	No
Middlesex University	Unallocated Land	University requests that the Council consider the allocation of the land at 13-21 Church End for a student housing scheme to further support its drive to improve the quantity and quality of student accommodation within the vicinity of the Hendon Campus. Capacity studies undertaken as part of the Hendon Regeneration Project indicate that this site could accommodate 41 student beds.	See response above	No
London Diocesan Fund	Unallocated Land	The key points to extract from these representations are as follows: <ul style="list-style-type: none"> <li>• The Council should plan for a higher level of housing need based on the Standardised Method;</li> <li>• Releasing Green Belt sites will be a necessity to meet housing need in the area, including aiding the delivery of family sized homes and important infrastructure such as schools.</li> <li>• Rectory Farm is a deliverable and available site which is suitable to accommodate an extension to the existing Mount House School and deliver much needed housing to meet the Council's short-term needs whereby the majority of growth is reliant on strategic sites.</li> <li>• The Diocese are in discussion with Mount House School to provide part of the site for a sports centre. The school has confirmed they will support community access to the facilities for which there is a large shortfall in the Borough. The site is located to the north east of Barnet, adjacent to Mount House Independent School, situated to the north of Camlet Way, Monken Hadley. The site is currently designated as Green Belt in Barnet's Local Development Framework. The site benefits from being in an accessible location. Hadley Wood train station is a 15-minute walk from the site, with trains running directly to both London Moorgate and Welwyn Garden City every 10 minutes. Camlet Way Bus Stop (immediately in front of the site) is served by bus route 399 and Broadgates Avenue bus which has several other regular bus services is within close proximity. Monken Hadley/Chipping Barnet town centre is approximately 0.9 miles or a 17-minute walk, close to various existing shops and services. Mount House operates successfully, therefore this location is considered appropriate for this use. The site is also in close proximity to Moken Hadley C of E Primary School. The Diocese has previously promoted the site through both the Call for Sites (2017) and the Growth Strategy (2019). In addition to this, representations to the Special Educational Places Plan Consultation Document stating that the site would be available to provide a temporary facility for the Windmill Free School before its opening in 2023 or 2024. An application was submitted on the south</li> </ul>	The Green Belt and MOL Review demonstrates no justification for releasing land designated as such or making significant revisions to existing Green Belt and MOL boundaries. The draft Local Plan demonstrates how Barnet will accommodate growth through Policies BSS01 and GSS01.	No

		west of the site for the erection of two single storey buildings and associated hardstanding for use in association with existing riding school/ livery stables following demolition of existing farm buildings (Ref: B/04272/20). Permission was granted in 2011. This was not implemented, but demonstrates the suitability of the site for additional built form. In 2019 an application (19/0957/FUL) was approved in 2019 for a two storey expansion block on Mount House School. This application highlights the School's intention to expand from its current capacity of 160 pupils up to 300.		
Readysset Resources Ltd (SMB Town Planning Ltd)	Unallocated Land	This is on behalf of Readysset Resources Limited, the freehold owners of no.133 Brent Street. This is a vacant and derelict 'L' shaped site extending to an area of 0.1058 hectares as delineated, lies within Brent Street Town Centre and consists of areas of hardstanding and overgrown vegetation and is currently used for car parking on an informal basis. The site's frontage to Brent Street is boarded up. Vehicular access into the site is from Brampton Grove. The site has been subject to a number of previous applications for a mixed-use development. Indeed, in April 2018 the Council granted planning permission for the erection of a 5-storey building with basement to provide commercial floorspace (A2 - Professional and Financial Services) on the ground and basement floors with 9 self-contained flats above together with the provision of basement car and cycle parking (ref: 17/7497/FUL). Paragraph 3.3.6 of the Council's Site Selection Background Document refers to the criteria of allocating housing sites as those of at least 0.1 hectare in area, " <i>capable of potentially delivering a minimum of 5 units</i> ". Furthermore, the site is available and deliverable with the potential to come forward for development during the plan period up until 2036. We disagree with the Council's approach that because the site has a valid planning permission it is likely to be included in the Housing Trajectory (to be published in the forthcoming Annual Monitoring Report for 2018/19) and does not need to be allocated in the Schedule of Sites. However, a Local Plan allocation for a site with a planning permission enhances the prospects consent particularly in the prevailing uncertain economic climate. Given the site's town centre location where the principal of a mixed-use scheme is acceptable, it should be allocated for residential and commercial development to include a range of appropriate Class A and B1 uses.	This site has a valid planning permission (2018) and forms part of the development pipeline. The principle of development on this site has therefore been accepted.	No
Harrison Varma Ltd (Savills)	Unallocated Land	Two new sites being proposed which are not allocated in the Reg 18 consultation document. The representations are framed by the potential to deliver further residential development from these sites which are summarised briefly along with their location plans. <b>98 Great North Road N20NL</b> The property is a standalone purpose-built brick office building. Arranged over 3 storeys, the property fronts Great North Road to the west with an embankment for the Northern line Underground immediately to the rear (east) of the building and its existing surface car park. Immediately north of the site is the vacant East Finchley Substation that has been designated as Site No. 25 in the proposed Site Allocations. In 2017, prior approval (Ref: 16/7819/PNO) was given to change the use of the existing building from office to residential use as permitted development. Although this approval was not implemented, the permitted development right continues to apply and a change of use to residential could still be brought forward. A separate planning permission was also granted in 2017 (Ref: 17/0285/FUL) to allow the upward extension of the existing office building to provide additional third and part fourth storeys. <b>The Towers and 1-5 Ardent Court Gardens, The Bishops Avenue N20BJ</b> The Towers and Arden Court Gardens are adjacent sites on The Bishops Avenue. The Towers is a single dwelling house and Arden Court Gardens features a total of five detached dwellings set out around a cul-de-sac. The sites lie on the eastern side of The Bishops Avenue, surrounded predominantly by large single dwelling houses set within distinct plots. The total area of the two sites is approximately 1.63 hectares. None of the properties have not been occupied for a considerable period of time. The site falls within the Bishops Avenue subset of the Hampstead Garden Suburb Conservation Area. The Towers is noted as a positive contribution to the Conservation Area whereas the properties of Arden Court Gardens are noted as a 'neutral area', in part due to their 1980s style not reflecting prevailing character in the local area. Though maintaining the considerable openness	<b>98 Great North Road N20NL</b> The extensive window for submission of proposal sites has now closed and the Local Plan is taking forward those sites highlighted in the Reg 18 Schedule of Proposals. This does not preclude this site coming forward for redevelopment in line with the policy framework outlined in this Plan.  <b>The Towers and 1-5 Ardent Court Gardens, The Bishops Avenue N20BJ</b> Principle for development has been established within the Hampstead Garden Suburb Conservation Area. That remains the overriding context for the future of this site.	No



		and tree planting within the site, planning permission was granted in 2015 (Ref: F/04857/14) for a residential development that replaced all of the existing buildings on-site with three separate blocks to provide a total of 44 flatted residential units. The development also included significant subterranean development to accommodate car parking and ancillary facilities for the blocks. Though this permission has now expired, the development principles that supported the previous approval remain relevant. A location plan for each site is attached. It is expected that each site could be brought forward for residential development. This could be further supported by a policy context that is supportive of optimising residential development and most particularly from brownfield sites delivering higher density development.		
Casa Bella Developments	Unallocated Land	The circa. 0.8 ha site is located approximately 150m from Edgware Underground and Bus Station. It has excellent access to public transport as reflected in the site PTAL of 6a (where 0 is least accessible and 6b is most accessible). The site is located within Edgware Major Town Centre and it has excellent access to jobs, amenities, services and shopping. The site does not have historical value nor is the site located within close proximity to a heritage asset; the site is not located within, or adjacent to, a designated Conservation Area; the closest statutorily listed building is the Parish Church of St Margaret (Grade II), located approximately 400m to the south of the site. Part of the site falls within Flood Zone 2 and 3. Following detailed assessment and liaison with the Environment Agency it has been demonstrated that flood risk to future occupants can be suitably mitigated. In March 2019 planning permission (ref: 18/2839/FUL) was granted for the redevelopment of the site to provide 52 dwellings. Basement car parking formed part of the proposals providing a total of 36 car parking spaces. Site Allocation The draft Local Plan at paragraph 15.1.7 states that sites with planning permission are not included within the Schedule of Site Proposals but instead are included within the Housing Trajectory. Given that the extant planning permission has not been implemented, the Local Plan should specifically allocate the site in order to provide support for redevelopment and intensification. This would provide an appropriate and positive planning context for future applications should the extant permission remain unimplemented. The site has potential to deliver a significant number of residential dwellings on a brownfield site in a sustainable location. NPPF promotes the effective use of such underutilised brownfield sites to deliver homes. For this reason an allocation for residential intensification should be provided in the Local Plan. Residential Intensification Local Plan seeks to deliver between 2021 and 2036 a minimum of 46,000 new homes (3,060 per annum). The Council has set this target following the preparation of a SHMA. This target is well below housing need when calculated using the Government's Standard Methodology (-applying this methodology the Council is required to deliver 4,126 new homes per annum). Taking account of this significant shortfall, it is important that residential intensification of sustainable locations such as the subject site should be supported within a positive planning framework. In this context, the Council should explore further optimisation across the Edgware Growth Area and the borough more generally. Furthermore, should the Council maintain a minimum housing target which is not in conformity with the Government's Standard Methodology, the policies of the draft Local Plan should be worded to support additional housing delivery to exceed the minimum target where proposals are demonstrated to be of high design quality. Of the Council's planned housing delivery, 5,000 new homes (13% of Borough wide targets) are proposed to be delivered in the Edgware Growth Area alongside better connections, new public space, food, drink and leisure opportunities. The 'High' residential growth potential of Edgware town centre is identified in the draft New London Plan (NLP). Furthermore, the draft NLP promotes making the best use of land within town centres by optimising residential growth potential, with priority outlined for well-connected sites. The NPPF also recognises that residential development often plays an important role in ensuring the vitality of centres and therefore encourages residential development on appropriate sites. The growth of Edgware Town Centre with residential intensification is therefore supported through regional and national planning	Sites with extant planning permission were not included in the Sites Schedule, including where the permission has not been implemented. This site is reflected in the Housing Trajectory. Meeting Barnet's housing needs is addressed in Chapter 4 Growth and Spatial Strategy.	No

		<p>policies. Whilst the Council's aspirations for growth are supported in principle, as set out above, it is important that further optimisation is explored and that the policies relating to the Growth Area clearly express that the housing targets are a minimum, such that additional housing delivery is encouraged so as to exceed the stated targets where high design quality is demonstrated. Optimising residential density within town centre locations is also encouraged under draft Local Plan Policy GSS08. This approach is supported in line with draft NLP and NPPF policies. Parking In locations with a PTAL of 6a, such as the subject site, the draft Local Plan requires development to be car free. This approach is supported in order to promote use of sustainable transport infrastructure and to optimise the potential of sites within highly accessible areas. Tall Buildings The draft Local Plan identifies that the Edgware Growth Area will be an appropriate location for tall buildings. This approach is supported so to make best use of land in a sustainable location. Summary The draft Local Plan aims to deliver significant residential growth in Edgware. The principle of this growth is supported, alongside the aspirations to deliver an enhanced town centre offer with improved connectivity, public space, food, drink and leisure amenities. Given the excellent opportunity presented by the sustainable location of Edgware, with its excellent public transport connections and access to local jobs, services and amenities, it is very important that the development potential of sites, such as Rectory Lane, are optimised to the fullest potential so as to contribute to meeting the borough's housing needs. The draft Local Plan sets a minimum housing target which is some 25% below housing need (as calculated using the Governments Standard Methodology). The Council should therefore explore further growth potential in order to optimise sustainable locations such as Edgware. Should the Council proceed with lower housing targets that are not in conformity with the housing need figures derived from the Standard Methodology, the policy wording should expressly support additional housing delivery to exceed the minimum target where proposals are demonstrated to be of high design quality. Policies for tall buildings and car free development are also supported within Edgware. The extant planning permission for the Rectory Lane Site demonstrates that the site is suitable for residential intensification. The site can deliver residential intensification of an under-utilised brownfield site located in a sustainable location. Development on the site is yet to occur; therefore, the site should be allocated to ensure that there is a positive planning framework for bringing forward redevelopment. The site would contribute towards achieving sustainable development, a key requirement of the NPPF (Para 7) and would help the borough to meet its housing needs. It should therefore be allocated within the new Local Plan.</p>		
Dr P. M. Ashbridge	Unallocated Land	<p>Nos.778-860 High Road. (Site number not yet found.) The heritage "Shop-Tops" (first/second floors) run almost continuously on the east side of the High Road from the north corner of Friern Park to Ravensdale Avenue. Near the top of Ravensdale Avenue itself is the heritage building of North Finchley Library. Other heritage frontages include Barclays Bank (810), NatWest (786), and two striking and decorative tall red brick "tops" at 778 and 790 (both locally listed). Planning caution will need to be exercised in relation to the four low-level frontages of NatWest, Waterstones, Boots, River Island, framed by 778 and 790. Any additions to or behind these four of more than two storeys would reduce the impressive heritage context and framing provided by 778/790.</p>	As proposals come forward in North Finchley it will be important to carefully consider the historic character of the High Road	No
Dr P. M. Ashbridge	Unallocated Land	<p>West side, High Road (Site numbers not yet found.) An example of the many Victorian/Edwardian first/second floors of shops ("Shop-Tops") on the west side of the High Road is shown in the adopted SPD, page 42, captioned: "Image 34. Buildings contributing to local character". This almost unbroken run of surviving evidence of North Finchley's historic townscape, in several terraced groups of seven, five, five, three, etc., extends from Hall Street towards Lodge Lane, with decorative keystones and window features, Victorian dormers, etc. - but terminating at the lengthy and over-dominant modern YVA frontage. Historic England's recommendation for "careful consideration of the Victorian and Edwardian buildings lining the High Road" is very relevant here.</p>	As proposals come forward in North Finchley it will be important to carefully consider the historic character of the High Road	No

Mays Lane Gospel Hall Trust	Unallocated land	That LB Barnet should consider greater Green Belt release more generally to deliver housing given their great housing need, historic under delivery and over-reliance on a number of sites that are unlikely to be brought forward in the early stages of the Plan period. Other sites including the wider Mays Lane site identified above are available to be delivered within the first five years of the Local Plan period.	Barnet has the capacity to deliver a minimum of 35,460 new homes from 2021 to 2036. This is expressed in Policy GSS01 and subsequent policies GSS02-GSS12 demonstrate how we will deliver this. The Council has conducted a Green Belt and MOL Review which demonstrates no justification for making significant revisions to existing Green Belt and MOL boundaries.	No
Casa Bella Developments (Savills)	Unallocated Land	<p>The site represents under-utilised brownfield land which currently comprises a large two-three storey commercial building with a basement and is used as a car sales garage with car repair and servicing facilities. Large areas of hardstanding exist at the front and rear of the site which are used for the display of cars as well as for staff and visitor car parking. Cars are also parked on the roof of the building. The site is located within 100m from Colindale / The Hyde District Town Centre along the A5 which has undergone and is undergoing significant changes along its length. An indicative site location plan is provided below. The site is suitable for residential intensification and it should therefore be allocated in the Local Plan. The circa. 0.49 hectare site is located approximately 1.3km from Colindale Underground Station (16 minute walk) providing Northern Line services into Central London, and within walking distance of 6 bus routes (nos.183, 83, 32, 142, 324 and 204). Hendon Station is located 1.4km to the south of the site (17 minute walk) providing Thameslink rail services into central London and north to Luton. The Site has a Public Transport Accessibility Level (PTAL) of 2, with part of the site having a rating of 3 The Site is located within 100m of Colindale The Hyde District town centre providing convenience shopping. A Sainsbury's Supermarket is located 500m to the south and Morrison's, Asda, Marks and Spencer and Aldi are located 1km to the north, all within walking distance. The Site is not located in a Conservation Area and is neither statutory nor locally listed. There are no statutory or locally buildings within close proximity. The site is located in Flood Zone 1 at low risk of flooding. The Council's Proposals Map identifies the site within an Area of Archaeological Importance. This part of the Edgware Road is characterised by a mix of large commercial uses as well as more recent mixed-use developments. The character is varied. These include: Car showrooms to the north and west, The Hyde House Premier Inn, a 12-storey hotel and office building; and Ashton Lodge care home, a 6-7 storey care home. The Edgware Road is being intensified and transformed. This is clear from the various developments completed, underway and approved to the south and north along the Edgware Road, including (inter alia):</p> <ul style="list-style-type: none"> <li>□ 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);</li> <li>□ 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);</li> <li>□ 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);</li> <li>□ Zenith House, Edgware Road – Redevelopment to provide 309 residential units, 1611 sqm of B1/D1 floorspace and 97sqm of A class floorspace in buildings ranging from 2 to 16 storeys, application approved March 2011 (LB Barnet reference: /04167/10); and</li> <li>□ Park Parade Mansion – Redevelopment of site involving the demolition of buildings and the erection of 18 storey building containing 920 sqm of retail use, 164 of office use and 110 residential units, resolution to grant planning permission in November 2019 (LB Brent: 17/2284). Site Allocation</li> </ul> <p>The Local Plan should specifically allocate this site in order to provide support for the</p>	The extensive window for submission of proposal sites has now closed and the Local Plan is taking forward those sites highlighted in the Reg 18 Schedule of Proposals. The sites have been assessed thoroughly as suitable for development. This does not preclude this site coming forward in line with the policy framework outlined in this Plan, in particular GSS06 and GSS11.	No

redevelopment and intensification of the under-utilised site. This site is appropriate for redevelopment given the pressure and need for housing in the borough, and in London. The allocation would provide an appropriate and positive planning context for future applications. The site has potential to deliver a significant number of residential dwellings on a brownfield site in a sustainable location. The NPPF promotes the effective use of such underutilised brownfield sites to deliver homes. For this reason an allocation for residential intensification should be provided in the Local Plan. Policy H1 of the Intend to Publish London Plan encourages such allocations in preparing delivery-focused Development Plans.

**Residential Intensification** The draft Local Plan seeks to deliver between 2021 and 2036 a minimum of 46,000 new homes (3,060 per annum). The Council has set this target following the preparation of a Strategic Housing Market Assessment. This target is well below housing need when calculated using the Governments Standard Methodology (applying this methodology the Council is required to deliver 4,126 new homes per annum). Taking account of this significant shortfall, it is important that residential intensification of sustainable locations such as the subject site is supported within a positive planning framework. Furthermore, should the Council maintain a minimum housing target which is not in conformity with the Government's Standard Methodology, the policies of the draft Local Plan should be worded to support additional housing delivery to exceed the minimum target where proposals are demonstrated to be of high design quality. Taking account of this unmet need, it is important that residential intensification of suitable locations such as the subject site are supported within a positive planning framework. The draft Local Plan identifies that growth will be concentrated in the most sustainable locations with good public transport connections. The Draft Plan states that this includes 6,100 homes in District Centres and 4,900 homes along Major Thoroughfares. The Edgware Road on which the site is located is identified as a Major Thoroughfare within the draft Local Plan, therefore, a location where growth is proposed to be concentrated. As identified above the site also has good public transport connections and is only 100m from the Colindale District Centre where significant additional growth is proposed. Such growth is supported in the Intend to Publish London Plan where enabling development of brownfield sites on the edge of town centres are promoted under Policy GG2. The Intend to Publish London Plan also promotes making the best use of land by optimising residential growth potential, with priority outlined for well-connected sites. This demonstrates that residential intensification of the subject site is supported within the emerging London Plan and provides further justification for allocation of the site.

**Employment** The draft policies on assessing alternative uses on non-designated employment sites within Policy ECY01 of the draft Local Plan are unclear, and not justified. There should be no requirement for premises to be vacant for over 12 months, because marketing can be carried out whilst a premises are occupied. The requirement for a period of vacancy should therefore be deleted. In accordance with the NPPF, policies need to reflect changes in the demand for land in the context of making effective use of land in meeting the need for homes and other uses; therefore, requiring vacancy would not be a reasonable approach.

**Parking** In locations with lower PTAL ratings, such as the subject site, the draft Local Plan requires development to provide car parking. The site is located within close proximity of bus, rail and underground links. The site is also located within 100m of a District Centre and within walking distance of other retail stores. These provide access to a range of shops, services and employment opportunities for potential future occupants of the site. The draft approach stated within the draft Local Plan of using the PTAL rating to establish maximum parking standards is not always suitable. It is suggested that further criteria are included within Policy TRC03 so that account can be taken of access to shopping facilities, amenities and employment opportunities in determining appropriate levels of parking for individual sites. Other criteria that should be considered should include: the type, mix and use of development. This approach would be in accordance with the NPPF which states that if setting local parking standards, policies should take account of these criteria.

**Tall Buildings** The draft Local Plan identifies that development along a Major

		<p>Thoroughfare, such as the A5 Edgware Road, will be an appropriate location for tall buildings. This approach is supported so to make best use of land in a sustainable location. As identified above the Edgware Road has been subject to a significant amount of development in recent years with development rising up to 28 storeys in height. These applications demonstrate that the Edgware Road is a suitable location for tall buildings, where tall buildings are characteristic of the townscape of Edgware Road. Summary The draft Local Plan aims to deliver significant residential growth within Colindale, around District Centres and along the Edgware Road which is identified as a Major Thoroughfare. The principle of this growth is supported. Given the excellent opportunity presented by the sustainable location of Colindale, with its good public transport connections and access to local jobs, services and amenities, it is very important that the development potential of sites, such as The Hyde, are optimised to the fullest potential to contribute to meeting the borough's housing needs. The draft Local Plan sets a minimum housing target which is some 25% below housing need (as calculated using the Government's Standard Methodology). The Council should therefore explore further growth potential in order to optimise sustainable locations such as Colindale. Should the Council proceed with lower housing targets that are not in conformity with the housing need figures derived from the Standard Methodology, the policy wording should expressly support additional housing delivery to exceed the minimum target where proposals are demonstrated to be of high design quality. The draft Local Plan policy on alternative uses on non-designated employment sites should be amended to remove the requirement for vacancy as this would not be a reasonable approach, in the context of the need to make effective use of sites. Parking policies within the draft Plan do not allow sufficient flexibility to allow for the best use of development sites, given its focus on PTAL ratings. Other criteria should be taken into account and reflected in planning policy in accordance with the NPPF. The site can deliver residential intensification of an under-utilised brownfield site located in a sustainable location. The site should be allocated to ensure that there is a positive planning framework for bringing forward redevelopment. The site would contribute towards achieving sustainable development, a key requirement of the NPPF (Paragraph 7) and would help the borough to meet its housing needs. There is therefore strong justification for the allocation of the site within the new Local Plan.</p>		
Dalton Warner Davis LLP	Unallocated Land	<p>On behalf of Aberdeen Standard Investments PLC DWD supports allocation of the Car Showroom Site (approx 0.79Ha with 4,500 sqm (GIA) of car showroom space) for a residential-led development. In line with the NPPF the Site is considered both deliverable and developable and using the NPPG it can be demonstrated that a residential-led development at the Site is suitable and achievable, with the Site also being available. The Site is located along a designated Major Thoroughfare which is considered a growth corridor suitable for higher density residential development which would contribute to the Borough's ascribed private and affordable housing targets, whilst improving public realm and connectivity between sites along the Edgware Road major thoroughfare and nearby transport connections. The Site is also located adjacent to the Silk Stream, which is part of a green corridor extending to Brent Reservoir. This also offers the opportunity to contribute to Borough's aspirations of providing biodiversity enhancements to the Silk Stream to the benefit of the locality. It is recognised that the Site is designated as part of a LSIS which safeguards industrial land in the Borough, but upon further review of the existing use of the Site, the context of the Site, and the evidence and recommendations of Barnet's Employment Land Review, it is considered that this constraint to allocation can be overcome. The Site is grouped with the Garrick Industrial Centre, as a designated Locally Significant Industrial Site ("LSIS"), however the site is currently not used for industrial purposes and sits outside the remainder of the Industrial Estate accessed from Irving Way. The Site is also adjacent to existing residential dwellings to the south on Garrick Road and approved residential uses to the north on the Sainsburys Site at Hyde Estate Road. The Site is also located adjacent to an industrial estate known as the Garrick Road Industrial Estate ("Garrick Estate"). The Site is currently occupied by</p>	<p>Garrick Industrial Centre is designated employment land (LSIS) in the Local Plan. Site 21 in Barnet's ELR clearly identifies Garrick Industrial Centre a small stand-alone office, light industrial and retail site behind the A5 consisting of 24 two-storey units, some with loading bays and reception areas. The ELR advises that this site should be retained for employment use. Given the LSIS designation the Council will expect any proposal to be innovative and respond positively to the safeguarding rather than the simplistic solution of changing the boundaries of the LSIS.</p>	No

		<p>a single-storey car showroom with car servicing and repair located to the rear. The existing building on the Site does not address the Edgware Road frontage and is set back to accommodate a forecourt. Part of the forecourt area of the Site is located within a Flood Risk Zone 2 which will require a flood risk assessment and mitigation strategy to be provided with any future application. An area of Flood Risk Zone 3 is also located adjacent to the Site. The most simplistic action which could be taken to overcome the identified policy constraint, would be to release the Site from its designation as an LSIS. This would involve an amendment to the LSIS boundary to retain the existing employment land on the Garrick Estate, whilst releasing the Site. Promotion of the Site by the Client for a residential-led development is an indicator as to the availability of the Site as per the NPPG, whilst development of the type proposed is considered achievable as demonstrated by the Client's active interest in the site and the emerging precedent around the Site. Therefore in line with Regulation 18 (3) of the Town and Country Planning Local Planning (England) Regulations 2012 Act 1990, the Council is respectfully requested to consider the recommendations of this Consultation Rep to include Car Showroom, The Hyde, Edgware Road, London, NW9 6BH as an allocated site for a residential-led development in the Draft Local Plan Appendix 1 'Schedule of Site Proposals', whilst amending the boundary of the Garrick Estate LSIS designation to omit the Site. We would be grateful for an opportunity to discuss these matters further with the Planning Policy Team.</p>		
Fairview Estates	Unallocated Land	<p>Victoria Quarter and Hartland Drive. We object that neither site has been included within the "Schedule of Site Proposals" despite both sites being considered suitable for residential development and with relative recent approvals for residential development. The exclusion of both sites means the Plan has not positively prepared and is therefore unsound. <b>Victoria Quarter</b> located at the former British Gas Works, Albert Road. The site is 3.034ha and comprised the former Gas Works and a number of former commercial / residential properties which fronted onto Victoria Road. The majority of structures and hard surfacing on the site has been removed with decontamination and the basement car park dug out in accordance with Planning Permission ref: B/04834/14. The site's context is varied with a range of two and occasionally three storey semi and terrace houses located to the south east. Victoria Park is located immediately to the east of the site. To the north of the site is the Albert Road Gas Works with two storey terrace housing beyond. The Railway Embankment runs along the western boundary of the site. The site benefits from recent Planning Applications/ Permissions: Planning Permission Ref B/04834/14; Ref 16/7601/FUL; Ref 17/5522/FUL. In summary, the site has approval/approval pending S106 agreement for 371 new units/houses across the site as well as 618sqm of commercial space. Following a review of these applications and the updates to National and Regional Policy since the applications were submitted, Fairview and our JV Partners One Housing Group considers that current/pending permissions do not make the most effective use of the site and the site has capacity for additional dwellings given its location on the edge of the Town Centre and close to the railway. We consider that the site has capacity to provide c.660 residential units with 423 sqm commercial space. This would provide c.289 additional units for the Borough and ensure the site developed to its optimal capacity. This has been discussed with Officers during the pre-application process and is generally supported. We therefore contend that the Victoria Quarter should be allocated within the emerging plans for an increased number of units than currently permitted/proposed to ensure that the Council optimises its capacity. The site current exclusion from emerging plan demonstrates that the Local Plan has not been positively prepared and is unsound. <b>Hartland Drive</b> located to the north of Edgware and is c.1.7ha. The site is currently vacant and is located to the north of Hartland Drive and to the south of Broadfields Primary School. The site has been purchased by Fairview New Homes with the intention to commence development immediately upon a satisfactory planning permission. The site was previous an Infant School but was vacated with all structures demolished following the construction of Broadfields Primary School. There are a</p>	<p>The Council has conducted an extensive 'call for sites' process and it is unfortunate that Fairview have not participated in this information gathering exercise to support Barnet's Local Plan. The absence of these 2 sites from the Schedule of Proposals does not make the Local Plan unsound. The principle of development has been established at Victoria Quarter. Similarly at Hartland Drive the principle of development has been established with the recent planning permission in 2016.</p>	No

		number of relevant Planning Permission for the site: Planning Permission Ref: H/04494/08 and Ref 15/0337/FUL granted in 2016 for 112 residential units comprising 52 houses and 60 flats. As demonstrated by the sites planning history, the Hartland Drive is brownfield site which has been previously considered suitable for residential development. We contend that this still the case and the site could accommodate c.130 units. The site should be included within the Schedule of Site Proposals and its current absence demonstrates that the Council are not considering all suitable housing sites to meet their objectively defined need. The Council has therefore failed to plan positively and the plan is unsound.		
TfL (CD)	Unallocated Land	consider that Golders Green transport hub should have a site allocation. TfL CD considers this site to have capacity for significant mixed-use redevelopment in the future and, given its highly sustainable location, think it is important that the Town Centre Strategy fully recognises the scope for residential uses to come forward as part of this	The Council has previously considered this location, but found it to be unsuitable for residential development due to severe impacts on heritage and local amenity.	No
Roger Chapman	Unallocated Land	Add new para 4.25 Barnet Wastelands - 4.25.1 The Barnet Wastelands are centred on Bishops Avenue in the east of the Borough adjacent to the Haringey and Camden Borough boundaries. The area comprises several poorly designed mansions many of which are in a derelict and abandoned state. High levels of empty properties are recognised as having a serious impact on the viability of communities. Consequently, it has been identified that dealing with empty properties can have social, regenerative, financial and strategic benefits. <sup>1</sup> The area is ripe for regeneration and should be redeveloped for social housing. Comprising some 26 ha of land a considerable contribution could be made to providing key worker housing for nurses, firefighters and police and other similar occupations. Improved bus services would be required particularly to connect to East Finchley Underground station and to local hospitals such as the Royal Free and Whittington and Highgate Mental Health Centre.	The Council recognises that there is a problem with derelict and abandoned properties around Bishops Avenue and would like to see a more efficient use of land that is consistent with the Local Plan policy framework and the Hampstead Garden Suburb Conservation Area.	No
Taylor Wimpey Strategic Land	Unallocated Land	TW has an interest in land to the east of Colney Hatch Lane to deliver residential development. It is considered that this site should be removed from Metropolitan Open Land (MOL) and allocated for housing as the site does not meet any objectives of MOL and is a sustainable location for housing which would assist in meeting LBB's housing requirement. The site is located to the south of the A406 and to the east of Colney Hatch Lane at the edge of Muswell Hill. Residential development adjoins the site to the east, south and south-west, with the Powerleague sports facilities and the A406 road to the north. Access to the site is currently provided from Fairfax Way, via Cromwell Road to the south of the site. The site has been vacant since 2004, having previously been in use as an Inner London Education Authority (ILEA) playing field and is approximately 1.77ha. The former pavilion on the site has been demolished. The site is currently designated as Metropolitan Open Land (MOL) in the adopted Local Plan. The site is located wholly within Flood Zone 1 but is not subject to any other designations.	The extensive window for submission of proposal sites has now closed and the Local Plan is taking forward those sites highlighted in the Reg 18 Schedule of Proposals. An assessment of Green Belt and MOL has supported this Plan and there are no merits for releasing this site from MOL designation.	No
Land owner at 360-366 Burnt Oak Broadway, (Avison Young)	Unallocated Land	It is our view that land at 360-366 Burnt Oak Broadway, Edgware HA8 5AN (refer to site plan at Appendix A) should be added to the Schedule of Site Proposals and allocated for housing development (potentially alongside small scale complementary commercial uses), in line with the following details: Site: Robins & Day Peugeot Garage Address: 360-366 Burnt Oak Broadway, Edgware, HA8 5AN Site Size: 0.71 ha, PTAL: 3 to 5, Ward: Burnt Oak, Existing Use: Sui Generis, Proposed Use: Residential, Location type: Urban, Privately owned under single ownership, Indicative Residential Capacity: 150 homes, Development Timeframe: 5-10 years. The site was not proposed to the Council as part of the Call For Sites consultation although should representations have been made, the site would have met the Council's assessment criteria for allocating sites on the grounds of being Suitable, Available and Achievable, as demonstrated below: <b>Suitability</b> - The site is previously developed and located in a highly accessible location on the edge of Edgware Town Centre and with a PTAL rating of 3-5. Planning policies at all levels support the reuse of such sites in principle, particularly for housing. Furthermore,	The extensive window for submission of proposal sites has now closed and the Local Plan is taking forward those sites highlighted in the Reg 18 Schedule of Proposals. The sites have been assessed thoroughly as suitable for development. This does not preclude this site coming forward in line with the policy framework outlined in this Plan.	No

<sup>1</sup> Empty Housing (England) By Wendy Wilson, Hannah Cromarty, Cassie Barton House of Commons Library Briefing paper Number 3012, 29 May 2019

		<p>the site is located on the edge of the Edgware Growth Area designation and within the Edgware Road/A5 Major Thoroughfare designation, therefore allocating the site for development would be firmly in line with the spatial policies of the new plan. The site accommodates large 'shed' style structures (which make an inefficient use of the site), alongside associated hardstanding. It is not located in a Conservation Area nor does it contain any listed buildings, therefore the demolition of the existing buildings is acceptable in principle in planning terms. The site is currently in use as a car dealership, which includes extensive associated surface car parking and the outdoor display of vehicles for sale. There are no planning policies that protect this existing use. Indeed, draft London Plan Policy H1 specifically supports the principle of redeveloping 'car parks and low-density retail parks' for housing. The site benefits from existing vehicular access provision from Edgware Road which can be re-used. It is suitable in technical and environmental terms. It is predominantly in Flood Zone 2 with Flood Zone 3 to the north. A culverted river runs along the northern boundary of the site. It has no recent history of flooding. The site is suitable for a range of uses (including residential) in flood policy terms. It is not subject to any protective environmental designations Heritage constraints are minimal. The nearest heritage assets are 70m to the south and 170m northwest of the site (both Grade II Listed Buildings), and the surrounding townscape context is not sensitive. Accordingly, we consider the site to be suitable for tall buildings (in line with draft Local Plan Policy CDH04). In summary, the site is considered Suitable for redevelopment. <b>Availability</b> - The site is privately owned and under single ownership. It is currently occupied under the terms of a lease but is likely to become available for redevelopment within 5-10 years. The landowner is actively seeking to redevelop the site. <b>Achievability</b> - Consultation with land agents confirms that there is demand for residential development land in this location and that the site presents a realistic and viable opportunity for development which would be attractive to a range of residential developers. We have demonstrated that the site at 360-366 Burnt Oak Broadway is Suitable, Available and Achievable for residential development and therefore propose that it is allocated for housing and included in Annex 1 – Schedule of Site Proposals.</p>		
Mill Hill Missionaries	Unallocated Land	That both sites, given their poor Green Belt performance, are released from the Green Belt and considered for future development.	The Green Belt and MOL Review demonstrates no justification for releasing land designated as such or making significant revisions to existing Green Belt and MOL boundaries.	No
Middlesex University (Tibbalds Planning)	Unallocated Land	Land occupied by Nos 1-3 The Burroughs which is owned by the University and lies directly to the south, should be added to the Ravensfield site proposal. This land has clear redevelopment potential to provide additional student accommodation, as identified in the work being undertaken on the emerging Middlesex University and The Burroughs SPD, and therefore this should be recognised in the draft Local Plan.	The Local Plan is taking forward those sites highlighted in the Reg 18 Schedule of Proposals. This does not preclude this additional site coming forward for redevelopment in line with the policy framework outlined in this Plan. .	No
Middlesex University (Tibbalds Planning)	Unallocated Land	In addition, the University requests consideration that the Council-owned land located directly to the north and west of the car park site (fronting onto Greyhound Hill) be added to the site proposal as a potential location for future educational space as part of the expansion of facilities at the Hendon Campus.	The site in question belongs to the neighbouring school and is considered to have value as future area for biodiversity and form part of a green corridor that can be traced back to the A41.	No
Whetstone Properties Ltd (Simply Planning)	Unallocated Land	As such, we would request that the site is reconsidered once again, once the Council has revised its approach to the preparation of the plan, to ensure soundness in relation to its assessment of the minimum housing need via the Standard Methodology. Once completed, we consider this will lead to the inescapable conclusion that a full stage 2 Green Belt review will be required and detailed consideration given to whether Green Belt land can be released under the exceptional circumstances outlined in Paragraph 136 & 137 of the NPPF.	. Paragraph 0.0.21 of the London Plan 2021 sets out that boroughs do not need to revisit the housing targets set by the Mayor. In addition to this paragraph: <b>013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance</b> is clear that where a spatial development strategy (in this case the LP2021) has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek	No



			to revisit their local housing need figure when preparing new strategic or non-strategic policies. The next version of the London Plan is expected to respond to the need for a strategic review of the Green Belt / MOL.	
Highways England	Evidence Base Strategic Transport Assessment	Highways England note a Strategic Transport Assessment has not been prepared as part of the Draft Local Plan, setting out the likely impacts of the Borough's preferred growth option on the wider transport networks and the requirements for new transport infrastructure/services over the lifetime of the Local Plan. This is in addition to transport evidence and modelling to be undertaken to determine what the impact of development could be on the strategic highway network and therefore what measures may be required to mitigate these impacts. It is therefore unclear at this stage whether it will be possible to sufficiently mitigate the impact of the allocated development locations or whether the impact will be too great to feasibly ensure that the network operates within capacity at the end of the plan period. Until this Strategic Transport Assessment has been submitted, Highways England are not in a position to offer any detailed comments at this point in time. We advise that a Strategic Transport Assessment is sent to Highways England for consultation as soon as possible. The Strategic Transport Assessment should be in accordance with Circular 02/2013. We require suitable measures to be considered and evidenced in the Local Plan to manage demand of future traffic levels and growth. The increasing demand for development and other infrastructure will likely result in wider impacts, which when combined with the provision in your Local Plan for improved transport links, may have a longer term impact on the M1 corridor in particular, which would be of interest to Highways England. Highways England expect the promoters of development to put forward initiatives that manage down the traffic impact of proposals to support the promotion of sustainable transport and the development of accessible sites. The transport related evidence base needs to be sufficiently appropriate, up-to-date, transparent and robust, such that it can be deemed sound. The evidence base should cover an appropriate area; for transport this may be beyond the borough boundary. The evidence base should also ensure that it assesses the individual and cumulative impacts of developments within the study area over the whole plan period and, as necessary, at various intermediate dates to identify any tipping points when action will be required. We welcome this opportunity to respond to Barnet's Draft Local Plan Regulation 18 Consultation and would like to request a meeting in order to discuss our response to the consultation and the way forward in terms of Highways England's response.	A Strategic Transport Assessment has been produced as part of the Local Plan evidence base and has informed the Reg 19 version.	Yes
Glenroy Estates	Evidence Base Alston Works	Policy E6 of the Intend to Publish London Plan (December 2019) requires boroughs to define detailed boundaries and policies for Locally Significant Industrial Sites (LSIS), justified by evidence in local employment land reviews taking into account the scope for intensification, co-location and substitution. The supporting text notes that designations should be based on evidence in strategic and local demand assessments. LB Barnet released their most up to date Employment Land Review in October 2017. Alston Works was assessed, and it was noted that the site "is very congested, in a mainly residential area. On-site parking is extremely congested, making deliveries difficult and possibly adding to local congestions". The assessment concludes smaller units should be promoted on site as these are considered viable in the longer term. The site used to be a large-scale employment site designated as an LSIS, but it was released from this designation in 2012 due to its limited potential for employment redevelopment after it was assessed in LB Barnet's previous Employment Land Review (2009). This document assessed the Alston Works estate and rated the site 'Red', taking into account various indicators such as age, building quality, parking provision, accessibility etc. The assessment recommended the release of the industrial designation for the following reasons: <ul style="list-style-type: none"> <li>• The site is almost entirely enclosed by residential buildings with a small entrance point onto Falkland Road;</li> </ul>	The Council is guided by the 2017 ELR, and its recommendations which supported the introduction of an Article 4 Direction to safeguard what were previously B1a and B1c uses.  There is flexibility within a LSIS designation for safeguarding creative industries as at Alston Works.	No

		<ul style="list-style-type: none"> <li>• It has limited accessibility and poor parking provision;</li> <li>• The site scores poorly in terms of fitness for purpose and marketability and is unlikely to appeal to any B8 type occupier; and</li> <li>• It has very limited redevelopment potential.</li> </ul> <p>Of the 24 industrial estates assessed in Barnet in 2009, only 3 were rated 'Red' including Alston Works. It is not clear from the LB Barnet 2017 Employment Land Review how it has been determined that Alston Works is now suitable again to accommodate LSIS uses, nor what circumstances have changed to warrant a stricter employment designation. The 2017 assessment appears limited, with no reference to future suitability of the site or the quality of the buildings currently in use. NPPF paragraph 31 requires the preparation and review of all policies to be underpinned by relevant and up-to-date evidence, which is adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals. In line with this paragraph, the text of Policy E6 of the Draft London Plan requires Employment Land Reviews to inform the definition of new LSISs. There is no evidence put forward within the 2017 Employment Land Review to explain why an LSIS should be established in this location, and the "scope for intensification" (as required by Policy E6) has not been examined at all. Paragraph 35 of the NPPF concerns the examination of new Local Plans and whether they are 'sound', with part b) requiring the preparation of a Local Plan be Justified; meaning it delivers an appropriate strategy, takes into account the reasonable alternatives, and is based on proportionate evidence. The LB Barnet Employment Land Review (2017) fails to shed new light on the appropriateness of the site compared to the 2009 review and seems to concur with the findings of the original document (which recommended the removal of the LSIS designation). It is also worth noting that the site has planning permission (application ref. B/02621/13) for the continued use of the existing buildings as 30 live/work units. The planning use class of live/work units does not conform with the requirements of an LSIS designation and its introduction would be counter-productive to the existing community. The site make-up has evolved over time in tandem with an economy which has shifted away from traditional industrial uses in this area and now the industrial buildings are being used for more creative, less intensive employment generating uses (which are considered more suitable for this area with regard to the amenity of neighbouring occupiers). If an LSIS was introduced, the existing community would be unable to grow organically and unable to adapt to a changing economic environment, as planning applications would be refused when assessed against the new designation. The LB Barnet Employment Land Review 2017 projects an increase in the professional scientific and technical services sector by 36% from 2016-36, with information and communication services, administrative and support services, education, and health, all projected to increase by more than 100,000 jobs over this period. Therefore, the conclusion that Alston Works must be re-designated as an LSIS is not based on any proportionate evidence nor understanding of the current lawful uses on site, and is therefore in direct conflict with paragraphs 31 and 35 of the NPPF, and it does not take into account other factors such as the scope for intensification, in conflict with Policy E6 of the Draft London Plan. For these reasons our client considers that an LSIS designation would not be justified as it is not based on a sound evidential assessment of the existing land use/site schedule of accommodation and would restrict economic development on site.</p>		
London Diocesan Fund (Iceni Projects)	Evidence Base  Green Belt Study	The Council appointed LUC to produce a Stage 1 Green Belt assessment to inform the preparation of the Local Plan. The site was assessed as having a strong contribution to 4 purposes of the Green Belt and a relatively weak contribution to purpose 2. As a starting point we do not consider the Stage 1 Green Belt Assessment to be an appropriate basis for determining which sites to remove from the Green Belt, thus the ability for sites to be assessed properly has been missed due to the absence of a more refined assessment of individual parcels. The recent Sevenoaks Local Plan was declared unsound and within the Inspector's Report was significant criticism of a similar approach. We have	Barnet has a housing target of 35,460 new homes and can demonstrate through this Local Plan a deliverable supply against this target. This helps to protect valuable Green Belt land from development	No

included our assessment of the site to demonstrate that the site does not fundamentally contribute to the five aims of the Green Belt as outlined within Para134 of NPPF. We consider that both housing and educational needs demonstrate exceptional circumstances sufficient to justify Green Belt release. We urge the Council to follow the examples of Enfield and Hounslow in exploring the potential of the Green Belt to meet housing requirements. Given the conclusions we consider that the site should be considered for release from the Green Belt in order to meet the overwhelming housing and sport and recreational needs in the Borough.

Purpose	LUC's Assessment	Our Assessment
Purpose 1 Assessment – to check the unrestricted sprawl of large built up areas	Strong	The site is boarded to the south and east by Mount House School and residential development situated in the Green Belt.
Purpose 2 – To prevent neighbouring towns from merging into one another	Relatively weak	The site forms part of an existing built up development and does not extend in to open countryside. Development of this site would extend to the north, therefore not contributing to the merging of neighbouring towns.
Purpose 3 - To assist in safeguarding the countryside from encroachment	Strong	The site contains an area of mature trees to the south west with Mount House School situated on the southern boundary of the site, enclosing the southern area of the site within the existing urban form.
Purpose 4 – to preserve the setting and special character of historic towns	Strong	The site is located in a Conservation Area, however any proposals for the site will respect and enhance the existing settling of the surrounding area.
Purpose 5 - to assist in urban regeneration by encouraging the recycling of derelict or other urban land	Strong	Development would not preclude the recycling of derelict and other urban land elsewhere in Barnet.

Historic England	Evidence Base	We are pleased to see that Barnet has a local list that is regularly reviewed. We note however that the local list makes little reference to landscapes, archaeology or historic associations. Landscape/archaeological components of the historic environment are particularly relevant to large parts of Barnet, given the borough's location on the edge of London with more green spaces, including large areas of Green Belt that may have much older traces of human activity than surviving elements of the built environment.	Due to the scale and complexity of revising the local heritage list it was decided to limit the range of potential entries to buildings and other structures and not include landscapes or archaeology.	No
Historic England	Evidence Base	focuses primarily on existing and permitted schemes and provides little guidance on how future tall buildings should be managed. The study says that the borough Characterisation Study should be the starting point when considering potential impacts. We encourage the Council to make use of this study at plan-making stage to provide more detail on potential height ranges in the site specific policies in Annex 1; this will help establish a properly plan-led approach to their management. The Council has a range of	Annex 1 highlights relevant policies for each site proposal including Policy CDH04 enabling cross-reference to strategic locations for tall and very tall buildings and their height ranges.	Yes

		existing evidence documents which could be drawn together to provide an explicit borough wide approach to provide clearer policy recommendations and support growth areas. The Tall Buildings Update places an emphasis on the creation of landmarks buildings to provide legibility but it is important to note that not all tall buildings can be a landmark and so it is questionable how helpful this is as policy criteria for decision makers.		
Pinkham Way Alliance	Evidence Base	Lack of significant evidence in the SFRA renders the Plan unsound	SFRA Stage 2 has been produced and has informed the Reg 19 document	Yes
Sport England	Evidence Base	Sport England does not consider the draft Plan as sound and consider that specific policies relating to indoor and outdoor sport facilities, including playing fields, should be included within the draft Local Plan, based on a robust and up-to-date evidence base, such as the emerging Playing Pitch Strategy Refresh and Indoor Sport and Recreation Facility Study. Although aware the Council are preparing the Playing Pitch Strategy, current policy is based on out of date information.	The Council's update to the Playing Pitch Strategy is underway. The Indoor Sport and Recreation Facility Study was completed in 2018 and is therefore not considered out of date.	No
Highways England	Evidence Base IDP	Highways England acknowledge and welcome that an Infrastructure Delivery Plan (IDP) will be prepared to accompany the Local Plan, setting out the infrastructure required to support the delivery of growth within the Borough. We would request that we are included in any subsequent consultation on the IDP, as there may be potential impacts on the SRN.	The IDP has been published as part of the Local Plan evidence base	Yes
Brent Cross South Partnership	Evidence Base	Although Figures 1 and 2 in the Draft Local Plan are useful, further clarification is sought as to how separate strategy documents published by the Council (e.g. the Barnet Housing Strategy (March 2019), the Draft Transport Strategy (February 2020), the Growth Strategy (2019), Education Strategy and Parks and Open Space Strategy) relate to and inform the Draft Local Plan (particularly where there is on-going consultation, such as with the Draft Transport Strategy).	The Local Plan provides the spatial representation of these corporate strategies.	Yes
Brent Cross South Partnership	Evidence Base	It would be helpful to understand how the Draft Local Plan will inform the CIL Review process, which we note from the Local Development Scheme 2020, is currently underway with a Reg. 22 submission expected in the Spring of this year. It will be particularly important for the CIL Review to look very closely at the viability considerations for the identified Growth Areas, particularly in relation to Brent Cross given the scale of development and infrastructure that is to be delivered in this area. It should also be noted that the strategic infrastructure in these areas does not only benefit the Growth Area(s) but will have wider, more strategic benefits within and beyond the Borough and so should be funded accordingly.	The Plan has been updated to reflect the milestones for the CIL review process. Consultation on the new CIL charging schedule took place earlier this year. .	Yes
Brent Cross South Partnership	Evidence Base	A number of documents forming the technical evidence base as noted in Appendix A of the Draft Local Plan (including the Infrastructure Delivery Plan and the Viability Assessment) will only be provided at the Reg. 19 consultation stage. These documents are important to understanding the effectiveness and deliverability of the Draft Local Plan, especially in relation to the Borough's allocated Growth Areas. Further detailed comments may arise on the relevant aspects of the Draft Local Plan once these documents have been made available.	These documents are now available as part of the Reg 19 evidence base	Yes
LB Enfield	Evidence Base <b>GTNAA</b>	We note that there is no objectively assessed need for pitches and plots for gypsies and travellers and travelling show-people households in Barnet but recognise that the requirement for pitches will be kept under review to ensure that sites remain available. This approach is broadly welcomed, which allows a permissive approach to be taken towards sites that may come forward and which meets its criteria, but we feel that Barnet may also needs to take account of any unmet needs from an adjoining authority.	We have revisited the evidence behind the GTNAA This will be reflected in our Statement of Common Ground with LB Enfield	No
Mayor of London	Map 25	Overall the Mayor supports the additions to the Green Belt and MOL, however, he has strong objections to the removal of the MOL designation where it covers green open space that are still distinguishable from the built-up area and forms part of the open land. Map 25 – the curtilage should remain as MOL as it contributes to the physical structure of London by being clearly distinguishable from the built-up area	Sensible to alter Green Belt and MOL boundaries in order to support the robustness of their designations and their practical application. The Green Belt Study highlighted that there is no practical benefit in the MOL boundary cutting through a building.	No

Mayor of London	Map 26	Map 26 – this area is predominantly green and along with the railway verge contributes to the physical structure of London by being clearly distinguishable from the built-up area	The Green Belt Study recommended this revision to align with the footpath	No
Mayor of London	Map 36	Map 36 - the curtilage should remain as MOL as it contributes to the physical structure of London by being clearly distinguishable from the built-up area	The Green Belt Study recommended a more rational and therefore stronger boundary	No
Mayor of London	Map 37	Green area should remain as MOL as it contributes to the physical structure of London by being clearly distinguishable from the built-up area	The Green Belt Study recommended that this would create a stronger and more defensible boundary	No
LB Harrow	Duty to cooperate	LB Barnet is located to the east of LB Harrow, with the A5 running north – south as the administrative boundary. Located along this are the two town centres of Edgware (Major) and Burnt Oak (District) which overlap the administrative boundary (Burnt Oak is also within the administrative area of LB Brent). LB Harrow has a strong history of good working relationships with LB Barnet, primarily through the West London Alliance. Cross boundary work has also been successfully undertaken and put into practice, specifically through the preparation of joint evidence base documents (i.e. West London Strategic Flood Risk Assessment, West London Strategic Housing Market Assessment), input into other borough specific evidence base documents (i.e. Green Belt review). Furthermore to this, there has been on-going dialogue between the West London Alliance boroughs in relation to planned future strategic infrastructure, specifically with regard to the West London Orbital Link. It is acknowledged that whilst this infrastructure is not planned to be located within LB Harrow, it is nonetheless in such proximity as to have a positive impact on orbital connectivity in West London. The current Strategic Infrastructure Delivery Plan commissioned by the WLA also represents positive joint-working between the boroughs and will assist in identifying infrastructure required to support development in the sub-region where it serves more than one borough. The draft Local Plan (Reg18) document states that Barnet Council will work collaboratively to plan for cross borough boundary matters. Consistent with this the London Borough of Barnet will produce evidence to show how it has complied with the duty to co-operate and produce statements of common ground with neighbouring local planning authorities, which includes LB Harrow, throughout the various stages of the adoption of the Local Plan. LB Harrow looks forward to working with LB Barnet in relation to the statement of common ground, which will provide detail in relation to the matters detailed (but not necessarily limited to) within paragraph 20 of NPPF (2018).	This will be reflected in our Statement of Common Ground with LB Harrow	No
Department of Education	Duty to Cooperate	Add DfE to list of relevant organisations engaged with in preparation of the plan. Notify DfE when the Local Plan is submitted for examination, the Inspector’s report published and the Local Plan adopted.	We welcome this response from the Department of Education and will ensure they are informed of progress on the Local Plan	Yes
Department of Education	Statement of Common Ground	Given significant cross-boundary movement of school pupils between LB Barnet and adjoining Boroughs, and because it is understood that LB Barnet is a net importer of pupils, DfE recommends that Council covers this matter and outcomes of cooperation to address it as part of its Statement of Common Ground.	Agreed that this will form part of Statements of Common Ground with neighbouring boroughs	No
Former MHNF	New Policy	A policy should be brought forward so that all properties are required to be clearly marked (illuminated at night) by their number in each street, not simply by their name, so that visitors and notably delivery drivers can easily locate the premises at all times, and do not spend huge amounts of time (increasing emissions) hunting for the property. Names do not inform someone searching for a property of their position in the street relative to other properties, and this is a significant contributor to noxious emissions.	Whilst acknowledging the merits of reducing carbon emissions this is outside the scope of the planning system.	No
Roger Chapman	New Policy GSS14 Barnet Wastelands	Add new policy - The Council will support the development of the Barnet Wastelands for social housing. The Council will use Compulsory Purchase Orders and other powers to tackle empty homes to acquire and consolidate underused, abandoned and vacant sites which proliferate along Bishops Avenue. The Council will seek: a) a high standard of design featuring good quality open space including linkages to the strategic walking network.	The Council agrees that more efficient use of land is needed in this location and is working to achieve this. It does not consider that a bespoke planning policy is merited. The Local Plan seeks high standards of design and supports sustainable modes of travel.	No

		<p>b) improved active transport links throughout the site to both Hampstead Heath, East Finchley and Highgate.</p> <p>New public transport links to East Finchley Underground station and town centre, the Royal Free and Whittington Hospitals and Highgate Mental Health Centre.</p>		
John Cox	London Plan	<p>To start with a general point, I presume you will give full and detailed consideration to the response of the Secretary of State to the Mayor last Friday, and to the Mayor's eventual reply. Many of his comments were in regard to housing. The Secretary of State, under the Greater London Authority Act 1999 Section 337 has directed that the new London Plan must be changed to increase the availability of land for housing. Amongst all the other text in his letter, I will follow Barnet's responses to the following remarks with interest: "It is important that both Government and you as Mayor are seen to be leaders in supporting ambitious approaches to planning and development; and I am concerned that your Plan actively discourages ambitious boroughs." "I am therefore Directing you to work constructively with ambitious London Boroughs and my Department to encourage and support the delivery of boroughs which strive to deliver more housing." "Your Plan will be to the detriment of family sized dwellings ... needed across London. This is not just in relation to their provision but also their loss, particularly where family sized dwellings are subdivided into flats or redeveloped entirely." "Steps must include: * Supporting ambitious boroughs to go beyond your Plan targets ... * Actively encouraging appropriate density, including optimising new capacity above and around stations."</p>	The Mayor has made changes to the London Plan in response to the Directions from the Secretary of State. Appropriate revisions have been made to Barnet's Local Plan as it needs to be in general conformity with the London Plan.	Yes
Roger Tichborne	Mill Hill	<p>Need more holistic approach for Mill Hill area with various other specific points raised with regard to the station at Mill Hill Broadway - air pollution and wider area regeneration. Stronger recognition of Mill Hill's sport and music potential, protection of green belt at Partingdale Lane and heritage and employment value of Mill Hill School.</p>	While there still remains a prospect for a Neighbourhood Plan at Mill Hill these more local issues are better addressed at that level within the strategic framework provide by Local Plan and London Plan	No
Lucia Carabine	General	<p>I am very concerned that there is massive residential development in the borough and Mill Hill in particular, but no local growth in employment opportunity. The plans for Brent Cross Growth Area boast retail space and assumed employment when retailers are suffering substantially from internet retailer competition. These plans were made 11 years ago when the demand for retail space was higher and I fear they will not contribute substantially to the growing employment needs.</p>	A key objective of the plan is to ensure that housing provision is matched by growth in jobs. The Plan sets safeguards to protect employment uses as well as identify new opportunities for jobs and skills and training.	No
Home Builders Federation	General	<p>We were unable to locate a viability report among the supporting papers. We assume this is because this is still work-in-progress and it depends very much on the outcome of this consultation. This is sensible. As advised by planning guidance, HBF and the development industry would welcome the opportunity to meet with the Council to discuss the assumptions that will inform that appraisal, in an endeavour to secure as much agreement as possible on key factors such as benchmark land values, development costs, profit margins etc. This would help to reduce the number of potential areas of dissent at the examination stage.</p>	A Viability Report has been published as part of the Reg 19 Evidence Base	Yes
CPRE	General	<p>Strong links should be drawn within the Local Plan to the Transport Strategy and related targets to reduce car trips and increase active travel as per the Mayor's Transport Strategy. In particular the Local Plan should reference the need for introduction of borough wide Controlled Parking Zones, borough wide Low Traffic Neighbourhoods and protected cycle track on all main roads and should ensure all new development is car-free or car-lite in particular to cater for older people, younger people and people on low incomes who cannot or do not want to drive. We welcome and support proposals where this approach is already planned</p>	Further evidence published on transport – Strategic Transport Assessment as well as Long Term Transport Strategy. This has informed the Reg 19 version.	Yes
Barnet Cycling Campaign	General	<p>Unfortunate that consultation on LB Barnet's Transport Strategy, which includes proposals relating to transport that should be reflected in planning policies, closed after the Reg 18 stage of its Local Plan. For example, proposals for Low Traffic Neighbourhoods are included in the Transport Strategy, but not in this version of the Local Plan</p>	Further evidence published on transport – Strategic Transport Assessment as well as Long Term Transport Strategy. This has informed the Reg 19 version.	Yes

Dr P. M. Ashbridge	General	<p>Important comments by Historic England on the North Finchley Town Centre SPD consultation need to be taken into account also for amendments to the Barnet Local Plan. For instance:</p> <p>(i) "When referring to 'gateways', it should be clear that these are not required to be tall buildings but could, for instance, be marked by different street surfaces or pavement widths to bring about different traffic behaviour, or attractive building form such as the Tally-Ho pub."</p> <p>(ii) "North Finchley has considerable integrity and historic interest in its townscape, reflecting its predominant phase of development in the Victorian period. By the 1890s the urban settlement was fully formed. Its heritage, while not designated as a conservation area, has much coherence and quality and pre-dates much of the townscape within the rest of the Borough. Careful consideration of the Victorian and Edwardian buildings lining the High Road and the adjoining areas, and other distinctive features of the town centre is an essential foundation for achieving enhancements to the benefit of the local area, and the vitality of the town centre in the long term."</p> <p>(iii) "The references to local character being enhanced are helpful. There is a clear opportunity in North Finchley to promote its future vibrancy and vitality through enhancement of its heritage."</p>	Historic England's comments were considered as part of the consultation on the North Finchley Town Centre SPD.	No
Highways England	General	<p>Thank you for consulting us on the Regulation 18 consultation for the Barnet's Draft Local Plan, setting out how the development and growth requirements of Barnet for the period 2021 to 2036 will be met. On behalf of the Secretary of State for Transport, Highways England is responsible for managing and operating a safe and efficient Strategic Road Network (SRN), i.e. the Trunk Road and Motorway Network in England, as laid down in Department for Transport (DfT) Circular 02/2013 (Planning and The Strategic Road Network). We are a key delivery partner for sustainable development promoted through the plan-led system, and as a statutory consultee we have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents. Highways England is aware of the relationship between development planning and the transport network, and we are mindful of the effects that planning decisions may have on the operation of the SRN and associated junctions. We cannot be expected to cater for unconstrained traffic growth generated by new developments, and we therefore encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour. We wish to draw your attention to Highways England's document 'The Strategic Road Network, Planning for the Future: A guide to working with Highways England on planning matters' (September 2015). This document sets out how Highways England intends to work with local planning authorities and developers to support the preparation of sound documents which enable the delivery of sustainable development. The document indicates that Highways England will review and provide comments on any amendments to local plans proposed by local planning authorities that have the potential to affect any part of the SRN. We do not consider it appropriate to state our support or objection to particular proposals, therefore instead this letter clarifies our views on a number of aspects of the Local Plan primarily focused on the potential impacts of all sites on the SRN and highlights junctions which may experience significant increases in traffic. This letter will also consider the evidence base used to understand the impact of development and the potential funding of any infrastructure schemes that are required. Our interest in local plans is specifically focussed on the council's approach to highway and transport matters in relation to regeneration and new development. Given that the M1 motorway passes through the London Borough of Barnet and the A1 which forms part of the SRN is situated on the northern border of the borough, we are keen to understand what impact the Barnet Local Plan will have on the SRN for which we are responsible.</p>	Our Strategic Transport Assessment clarifies the impact of growth on the Strategic Road Network.	Yes
Federation of Residents Associations in Barnet (FORAB)	General	<p>From the above we have identified five major areas of concern:</p> <p>1. The increasing in housing numbers, aspiring to 46,000, is unlikely to be wholly achievable in the timescale, but from the sites identified we recognise that delivery could certainly exceed 30,000. We do</p>	Please see responses to more detailed points by FORAB in the Schedule	Yes

		<p>conclude that the lower target of 33,460 is what is realistic and that figure should properly form the basis of the Plan.</p> <p>2. What is evident is that the vast majority of these planned new homes will be in high rise blocks on densely developed sites, with the majority of homes just one or two bedrooms. Faced with this reality the Plan should ensure that the existing stock of three to five bedroom homes is robustly protected against losses. This is not the case with the policies as currently presented, and in particular the notion of major intensification in and around town centres is ill-conceived in this respect.</p> <p>3. A more robust tall buildings policy is required to protect existing low rise areas.</p> <p>4. The proposals for town centres are outdated and need revising to reflect the current reality of retailing.</p> <p>5. There is a major mismatch between population growth and a largely unrealistic transport strategy.</p>	<ol style="list-style-type: none"> <li>1. The Local Plan is premised on delivery of a realistic housing target of 35,460 new homes by 2036 as set out in the London Plan.</li> <li>2. The Plan does protect and safeguard family housing as set out in HOU02 and HOU03. Having the supply to deliver against the housing target should help safeguard family homes</li> <li>3. Protections are in place for areas characterised by suburban housing through CDH04</li> <li>4. Town centre policy revised to reflect overhaul of the Use Classes Order in Sept 2020.</li> <li>5. Further evidence published on transport – Strategic Transport Assessment as well as Long Term Transport Strategy</li> </ol>	
Barnet Society	General	Pressure to maximise residential development numbers means that bus users will be disadvantaged by narrow roads, lack of through roads and/or distance between home and bus-stop. The Local Plan should ensure that public and sustainable forms of transport (e.g. cycles and walking) are properly designed into housing masterplans from the outset.	Policies in the plan (e.g. GSS10 penultimate bullet) require that proposals ensure active travel to promote walking and cycling and demonstrate access to public transport.	No
London Diocesan Fund	General	The Council state that a significant additional element of housing growth will come forward on small sites which are not yet formally identified (5,100 homes) based on previous trends. The NPPF (2019) states that where an allowance is to be made for windfall site as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. We support the view that smaller site play a significant part to play in housing delivery, however the Council have not provided evidence to justify this figure and so cannot be considered a reliable source of housing. Barnet should seek to explore other supplies such as Green Belt land, such as Rectory Field, to deliver this. The London Plan Examiner's Report also places considerable uncertainty on the delivery of small sites and we consider that the Council should focus on the delivery of appropriate sites in the Green Belt which can be identified and brought forward quickly.	Barnet has a housing target of 35,460 new homes and can demonstrate through this Local Plan a deliverable supply against this target. Small sites have an important role to play in housing delivery. Introduction of design codes will help to realise their potential and protect valuable Green Belt land from development.	No
LB Enfield	General	Thank you for the opportunity to comment on the emerging Barnet Local Plan Preferred Approach. Enfield Council will also be undertaking a Regulation 19 consultation on the draft New Enfield Local Plan later this year, setting out detailed policies and proposals for the next plan period and beyond. At present, several technical evidence studies are underway and further engagement is planned. At our Duty to Cooperate (DtC) meeting held on 10 February 2020, we discussed several strategic matters focused on establishing a greater understanding of cross-borough transformational growth and regeneration potential and the need for joint evidence to build consensus into our emerging respective Local Plans. We are keen to continue this cross-boundary working arrangement as some of the strategic matters relate to housing growth, infrastructure provision and place making. Our respective authorities both identified the need to work together to identify future growth opportunities within the emerging New Southgate Opportunity Area and generate a joint business case for future orbital public transport investment. From Enfield's perspective we look forward to continuing cross-boundary development conversations particularly regarding housing growth, infrastructure planning and town first centres strategy that both authorities are progressing.	This will be reflected in our Statement of Common Ground with LB Enfield	No



Department of Education	General	Whilst it would appear that there is currently sufficient capacity across LB Barnet, given the expected housing growth and large-scale regeneration across the borough, it is therefore important that a sufficiently flexible approach to school planning is taken. DfE supports the principle of LB Barnet safeguarding land for the provision of new schools to meet government planning policy objectives as set out in para 94 of the NPPF. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary, in accordance with Planning Practice Guidance and DfE guidance on securing developer contributions for education. Need to have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on Planning for Schools (2011) which sets out the government's commitment to support the development of state-funded schools and their delivery through the planning system.	Support for the Council's approach to safeguarding land for the provision of new schools is welcomed.	No
Lansdown	General	It is promising to see the plan prioritising sustainability in locating growth and development. Doing so is crucial to ensuring development results in the best outcomes for people and places, whilst also combating and acting on climate change threats that will arise in the near future.	Support noted and welcomed.	No
St William Homes LLP	General	St William are generally supportive of the Barnet draft Local Plan; the high level principles to seek efficient use of previously developed land to meet boroughs needs is strongly supported as is the Councils vision to focus growth around town centres and other key transport nodes. We understand the Borough's challenge in delivering the levels of forecast growth balanced against the need to maintain the quality of the environment.	Support noted and welcomed.	No
Former MHNF	General	A major initiative needs to be led by the Council to develop a thriving local economy for the future. It is a great shame that in Mill Hill we have lost the 1200 jobs from the National Institute for Medical Research. Public Health England too will soon be leaving Colindale. The loss of such specialist scientific staff and the support roles need to be replaced. Such a programme to be pro-active in bringing growing businesses to Barnet is long overdue.	The Council considers that through this Local Plan it sets out the conditions for growth which includes enhancing the local economy.	No
HADAS	General	Barnet HADAS and the Greater London Archaeological Advisory Service (GLAAS) need to work together to ensure that the draft Barnet Local Plan is referring to the most up to date archaeological information Use of phrase Archaeological Priority Area to be adopted throughout plan. In the meantime, HADAS considers that the phraseology used in the plan should be amended from "Local Areas of Special Archaeological Significance" to "Archaeological Priority Areas". This would require amendment in paras: 6.21.1, 6.21.5 Table 12 p. 119, Policy CDH08 (a)	Agreed. CDH08 has been revised to emphasise developers working with HADAS and GLAAS	Yes
Mayor of London	General	Mayor published his draft new London Plan for consultation on 1st December 2017. The Panel's report, including recommendations, was issued to the Mayor on 8th October 2019 and the Intend to Publish version of the London Plan was published on the 17th December 2019. Publication of the final version of the new London Plan is anticipated in Summer 2020, at which point it will form part of Barnet's Development Plan and contain the most up-to-date policies. The Mayor has received the response from the Secretary of State to his Intend to Publish London Plan and is considering his response. In due time, my officers will be happy to discuss the implications for Barnet's Local Plan, particularly in relation to Intend to Publish London Plan Policies E7 and G3 which are referenced in my letter below. Barnet's new Local Plan will be required to be in general conformity with the new London Plan. The Intend to Publish London Plan and its evidence base are material considerations in planning decisions. Please note that some of the policy numbering has changed from the original consultation draft London Plan 2017 to the Intend to Publish London Plan 2019. Mayor has strong concerns regarding Barnet's approach to restate renewal, MOL and car parking. He will provide his opinion on general conformity with the London Plan at the Regulation 19 stage. My officers would especially like to discuss the proposed alterations to the MOL boundaries, the policies on estate renewal and car parking standards as well as any implications from the Secretary of State Directions to the Intend to Publish London Plan.	The Council has made a number of revisions to the Local Plan in order for it to be in general conformity with the London Plan of March 2021.	No

Countryside Properties	General	Countryside was selected by the LBBarnet (LBB) as its preferred development partner for the regeneration of the Dollis Valley Estate following a competitive process. Dollis Valley Estate is located on the northern outskirts of Chipping Barnet, near High Barnet, the last station on northern line. The Estate is identified in the Council's 2012 adopted Local Plan – Core Strategy Development Plan Document (DPD), as one of the Priority Housing Estates for regeneration and it has been a key priority for the Council for many years to regenerate the Estate. At present, the Dollis Valley Estate (Phases 1 to 5) is halfway through the redevelopment process. To date, the Estate regeneration has already been successfully delivered for Phases 1 and 2. Countryside support the strategic aspiration of Policy GSS10 (Estate Renewal and Infill) to work in collaboration with local communities to develop a shared vision for estate regeneration schemes, including those currently underway. The principle of responding to the needs of existing households and demonstrating an improvement in the quality of the housing stock is fully supported and is reflected in the ongoing regeneration of the Dollis Valley Estate. Whilst the ambition to achieve a net increase of housing units is welcomed, we would highlight that where design or viability constraints apply, then this requirement should not restrict estate regeneration proposals coming forward. Where the needs of existing households are being met, any requirement for a net increase of housing units should be applied flexibly and taking into account site specific circumstances. In supporting the ongoing regeneration of the Dollis Valley Estate, Countryside is seeking to explore further development opportunities in the local area. This ambition includes continuing to meet the borough's local housing needs as well as securing benefits for the local community, as has been the case on the estate to date. As part of the local plan review process, Countryside would welcome the opportunity to work with the planning authority to meet this aspiration. In summary, as recognised within the draft Local Plan, estate regeneration represents a strategic priority for the borough. Countryside have been working with Barnet Council to deliver the Dollis Valley Estate regeneration which has been delivered successfully to date. In supporting the completion of this project, we would encourage the new draft Local Plan to provide for sufficient flexibility with regard to estate regeneration schemes, to ensure that the Plan is effective and positively prepared.	The Council welcomes these comments from Countryside Properties	No
Brent Cross Dev Partners (QUOD)	General	In summary, the DPs are generally supportive of the Draft Local Plan and in particular the recognition that the regeneration of BXC will need to deal with changes in economic and market conditions over a long period of time and as such further development proposals may come forward. However, the DPs consider that the proposed amendments identified in this letter should be made so as to ensure that a sound plan is prepared.	The Council welcomes this support	No
LB Brent	General	Brent Council welcomes the opportunity to respond to the London Borough of Barnet's consultation on its draft Local Plan (Reg 18) Preferred Approach Consultation. Brent Council is generally supportive of policies and aspirations within the draft Local Plan and is keen to continue joint working relationship with the LB Barnet to deliver benefits for the local area and communities. We have provided comments on the draft Local Plan which we hope will prove useful in informing Barnet's Local Plan policies.	This will be reflected in our Statement of Common Ground with LB Brent.	No
LB Harrow	General	LB of Harrow broadly supports the Barnet draft Local Plan (Regulation 18), and acknowledges the pressures faced in delivering an effective and efficient Local Plan. LB Harrow does not object to any of the policies within the draft plan, however, would welcome further discussion on matters that are cross boundary in nature with the potential to impact LB Harrow and its residents. Notwithstanding the general support of the current draft plan, Harrow would welcome the continued opportunity to comment further on the development of the plan going forward and any subsequent implementation. We reserve the right to refine our position on the draft Barnet Local Plan as it further develops and as LB Harrow progresses its own evidence base and Local Plan review.	This will be reflected in our Statement of Common Ground with LB Harrow	No
Land owner at 360-366 Burnt	General	We write on behalf of the owners of land at 360-366 Burnt Oak Broadway. In general we are supportive of the Draft Regulation 18 Local Plan and the positive and encouraging policy approach to delivering housing in an appropriate and planned manner that will significantly contribute to the Borough's	The Council welcomes this support.	No

Oak Broadway, (Avison Young)		increased housing targets. Our representations are supportive of Policies GSS01; GSS05; GSS11; CDH01; and CDH04.		
Barnet CCG	General	Overall, the CCG supports the objectives and policies of the plan.	The Council welcomes this support.	No
TfL	General	We strongly welcome the Council's aspiration support growth in Barnet while enabling a greater mode share for walking, cycling and public transport use. In particular, we welcome the ambitions set out in the draft local plan to: reduce car use, implement the Healthy Streets Approach and achieve the Mayor's Vision Zero ambition. We are pleased to see the plan's recognition of the importance of active travel in improving health outcomes and the role reducing car journeys has in improving air quality. We commend the Council on the considerable progress they have made on developing car parking standards that will make growth in the borough more sustainable, taking into account the extent of alternatives in different locations. We do however have concerns regarding the standards not reflecting the Intend-to-Publish London Plan approach to Town Centre/and Opportunity Area residential parking, and the approach at PTAL 5, as provision of up to 0.5 spaces per dwelling is significantly higher than the London Plan. We also have concerns about how CPZs are approached in regard to the latter, and the use of a connectivity measure that could be open to challenge, but we would welcome further dialogue on this issue. While the Intend-to-Publish London Plan does not differentiate standards based on unit size, we do not object to Barnet doing so in principle providing that overall provision is within the London Plan standards. We welcome the Council's support for delivering improved rail capacity and infrastructure in the borough. To better support this, we urge the Council to ensure that vital land necessary for the operations and enhancement of London Underground and rail services – particularly the Northern line – are sufficiently protected. Where there are opportunities to do so, development proposals should also contribute towards provision of step-free access and capacity enhancement at stations. We welcome the Council's support for the West London Orbital rail scheme, which will improve public transport connectivity within Barnet and to neighbouring boroughs. We would emphasise the importance of the approach above to maximising sustainable travel and minimising provision for car use to making the business case for the scheme as strong as possible. We also welcome the support the Council give to Crossrail 2 and the major benefits the scheme could bring to Barnet and to New Southgate in particular. We strongly welcome the Council's ambition for improved public transport connectivity in the borough, including through buses. We are keen to continue this discussion to identify how best to achieve this, including identifying where the most significant connectivity gaps currently exist, which may not be purely radial nor orbital. We urge the Council to ensure developments play their role in supporting higher levels of services and improved reliability, such as through bus priority measures. Our responses to specific points in Barnet's draft Local Plan are set out in more detail in the attached appendix. We look forward to continuing to work together in drafting the final document and are committed to continuing to work closely with the GLA to deliver integrated planning and make the case for continued investment in transport capacity and connectivity to enable Good Growth in Barnet and across London.	The Council's response to detailed points from TfL on sections of the Local Plan is set out elsewhere in this Schedule	Yes
Cesira de Chiara	General	With a 15% projected increase in population together with reductions in funding for community infrastructure such as healthcare, the Barnet Draft Plan suggests unsustainable development.	The Local Plan is supported by the Infrastructure Delivery Plan which provides an assessment of current infrastructure provision, future needs, gaps and deficits, along with an indication of costs of providing infrastructure.	No
Client interested in North Finchley TC (Quod)	General	On the whole, our client is supportive of Barnet's approach to the draft Local Plan. However, it is important that the emerging Plan does not constrain local growth projections, in particular in those centres that are prioritised as being able to accommodate growth as set out in supplementary planning guidance. We trust that you will fully consider our client's comments and ensure that any emerging policy does not prevent the successful regeneration of North Finchley from being realised.	The Local Plan seeks to manage rather than constrain growth. The Council welcomes this support and shared ambition for the successful regeneration of North Finchley.	No

Mary O'Connor	General	Not enough time to comment and also contains too much use of 'may' and 'should', leading to believe it is not a requirement.	The Reg 18 has been subject to extensive consultation. National policy sets the limits for planning terminology as part of a flexible and responsive planning system	No
Former MHNF	General	Barnet Council doesn't have a single FTSE 100 company headquartered in its borough. Despite being 20-30 minutes commuting time to Central London, having lower cost housing and more green spaces, we are not attracting significant commercial enterprises. We are undoubtedly popular for micro-businesses, but with the changes to IR35 many will undoubtedly fold. We could be famous for having the most company closures over the next 12-24 months and the fewest start-ups. Our Town Centres are not thriving as they should be, in part because of the loss of office workers. We have already recommended the adoption of Polycentric initiatives as the way forward. We do not just want local jobs in low level service roles but medium and highly skilled roles as well, in light industrial areas, and professional services etc. We have in mind those who leave employment to raise a family and on return, juggling child-care, cannot afford the commute time needed by a job in Central London. They need the stimulation they were used to, in a local setting where they can be productive while having time to drop-off and collect their primary aged children each day. The Council needs to be pro-active in seeking out mid and large-scale organisations who could be attracted to bringing their business to Barnet. We could possibly be attractive to high-technology companies who might otherwise settle around Shoreditch or in Cambridge. We should try to create a Science and Technology park in Barnet to attract potential investors.	Ambitions to attract inward investment to the Borough are set out in a range of Council strategies and initiatives including the Growth Strategy. A key objective of the plan is to ensure that housing provision is matched by growth in jobs. The Plan sets safeguards to protect employment uses as well as identify new opportunities for jobs and skills and training.	No
Dr P. M. Ashbridge	General	This historic North Finchley townscape, lining the centuries-old Great North Road and complemented by the many surviving Victorian and Edwardian houses in its side roads, is indeed, "an irreplaceable resource".It enhances the Town Centre and needs to be safeguarded from incautious or negligent development.	These important issues on townscape character were considered as part of the consultation on the North Finchley SPD.	No
Department of Education	General	DfE loans to forward fund schools as part of large residential developments may be of interest, for example if viability becomes an issue. See Developer Loans for Schools prospectus for more information.	This financial support for new schools is reflected in the supporting text for CHW01	Yes
CPRE	General	We support the intensification of areas of extensive surface car parking and low-rise industrial / commercial space and more generally very much support development which is based around active travel and public transport, is 'car-free', removes and/or controls car parking spaces and moves the borough away	This support is welcomed.	No
Friern Barnet and Whetstone Residents' Association	General	Whilst it is appreciated that those charged with writing the draft Plan will no doubt have been keen to ensure that, as a document, it attracts and retains the reader's attention, we believe that the variety of the terminology used in framing the Policies creates confusion and uncertainty and that greater precision of drafting is required for a document that will inevitably be subject to technical and legal interpretation. To illustrate the point, consider the following examples: Policy HOU01 Affordable Housing: The Council will ... expect...require...seek Policy HOU04 Specialist Housing: 1. Proposals for people with social care and health support needs should...2. Proposals for new HMOS must...3 Proposals for purpose built student accommodation should...4 Any proposals for large scale shared-living accommodation will be expected to demonstrate...Does "expect" mean the same as "require"? If not, what is the difference in terms of the extent of the policy? If the meaning is the same, why create uncertainty by using different words? What is the difference between "expect" and should? Etc, etc. Such ambiguities need resolving throughout the document.	We have looked at consistent use of terminology as part of the Reg 19 production. National policy sets the limits for planning terminology as part of a flexible and responsive planning system	Yes
LB Enfield	General	As agreed thorough our recent cross borough meeting an initial Memorandum of Understanding (MoU) is to be drafted between respective officers setting out key working groups related to the New Southgate Opportunity Area, Strategic Public Transport Investment, Town Centres and the establishing future	This will be reflected in our Statement of Common Ground with LB Enfield	No

		Regional Parks and rewilding of the Chase area within Enfield. This can then form the evidence of collaborative working that can support respective Local Plan examination processes.		
Friern Barnet and Whetstone Residents' Association	General	We generally support the responses of FORAB and The Finchley Society, which we have had the opportunity of reading.	We refer to Council responses to issues raised by FORAB and Finchley Society	No
LB Harrow	General	Broadly supportive and would welcome further discussion on matters that are cross boundary such as Edgware SPD, Burnt Oak OA, A5 and tall buildings.	We welcome the support and will continue to work with Harrow, including the SPDs mentioned. This will be reflected in our Statement of Common Ground	No
Dr P. M. Ashbridge	General	Rather than being taken as a pattern for the future, the two tall, badly-designed misfortunes at the N12 Kings Way/Ballards Lane gyratory (grey Finchley House and the 11-storey block of flats) should somehow be enabled to fade into the background (or disappear?).	When more detailed proposals come forward in North Finchley there will be an opportunity to comment on their design	No
Lodge Lane Residents Association	Typos/Grammatical errors	<p>2.3.1 Last sentence doesn't make sense as currently worded. Remove "By"</p> <p>3.1.1 needs a comma before "Barnet" or rewording.</p> <p>GSS02 alternative 1 – "would be to inappropriate" should be "would be inappropriate".</p> <p>GSS12 "development of and above" should be "development on and above"? Not clear what's being said here.</p> <p>5.4.6 remove brackets on 2nd line.</p> <p>5.5.9 Table 5 should say Table 6</p> <p>HOU05 4 doesn't make sense! Remove "are identified" from the end of the para.</p> <p>6.12.1 line 2 "resident" should be "residents"</p> <p>6.15.3 2nd sentence: "are an important to make the area welcoming": an important what?!</p> <p>CHW 02 should be CHW02</p> <p>8.14.5 superfluous comma at end of line 1.</p> <p>9.4.5 should be "over time" not "overtime".</p> <p>10.1.2 line 3 "it's" should be "its". Line 4 "adaptation, to" should be "adaptation to".</p> <p>Table 17 entry 3 "form" should be "from".</p> <p>10.5.23 line 6 missing period after "lands".</p> <p>TRC03 b) line 2- "be place" should be "be in place".</p> <p>Site 48 Site Description "three story officer" should be "three story office"</p>	The Council welcomes this input and has changed text as requested	Yes