

## APPENDIX A

### Possible Changes to Main Modifications for Inspectors Consideration in Response to Representations – October 2024

#### Appendix A1

#### Proposed Changes to Main Modifications in Response to Representations

Relevant MM & Policy or Para	Revision to Main Modification that Council does not oppose	Respondent & Council's Reason
<b>MM09</b>  <b>Para 3.3.1D</b>	<p>The long-term need for retail and leisure space is not the same as the long-term needs for industrial and office space. A key component of the Local Plan evidence base is the Town Centre Floorspace Needs Assessment. This was completed in 2017 and produced on the basis of the pre 2020 Use Classes Order. There is a broad consensus that expectations of retail and leisure growth from before COVID19 have changed with movement away from traditional retail formats and the way we interact with town centres as the focus of local commercial activity. Within Barnet a key component of future growth is the delivery of a new Metropolitan Town Centre at Brent Cross. This will be delivered through the implementation of the 2014 consent which provides for up to 115,000m2 of new retail space <u>and through future planning applications consistent with Policy GSS02.</u></p> <p>The Council's premise is that Brent Cross will be the realisation of any future retail growth in Barnet. If in response to market signals retail growth is not delivered at Brent Cross, it is unlikely to be realised elsewhere within the Borough.</p>	<p><b>Response from Standard Life Investments Brent Cross LP &amp; Hammerson (Brent Cross) Limited as partners in the Brent Cross Partnership</b></p> <p>The Council considers that the proposed wording could provide clarification about the delivery of the Metropolitan Town Centre.</p>
<b>MM13</b> <b>GSS01 Part B</b>	<p>c) <u>An upgraded and enlarged Colindale Underground station providing step free access and enhanced public transport interchange;</u> <del>New underground station and enhanced public transport interchange at Colindale;</del></p>	<p><b>Response from Transport for London - Places for London</b></p> <p>The Council considers that these revisions could better reflect</p>

	<p>e) New bus stopping and standing arrangements <u>including drivers facilities in within and around</u> North Finchley <del>to allow redevelopment of the bus station;</del></p>	<p>proposed improvements at Colindale and North Finchley.</p>
<p><b>MM15</b> <b>Paras 4.10.3 &amp; 4.10.4</b></p>	<p>Delete MM15 para 4.10.4</p> <p><del>Brent Cross North and South Brent Cross Town within the Brent Cross Growth Areas are as shown in Map 3. Brent Cross West (Staples Corner) is illustrated by Map 3A. Brent Cross West (Thameslink) is shown in both Map 3 and Map 3A.</del></p> <p>Revise MM15 para 4.10.3</p> <p>The regeneration of the Brent Cross Growth Area is being delivered in three principal parts: Brent Cross North, Brent Cross Town, and Brent Cross West (Thameslink) <u>as shown in Map 3</u>. These three areas are in.....”</p>	<p><b>Response from LB Brent</b></p> <p>The Council considers that these revisions could remove ambiguity in the supporting text.</p>
<p><b>MM20</b> <b>GSS05</b> <b>Part C</b> <b>Para 4.18.4</b></p>	<p>Add footnote to first sentence of GSS05C</p> <p><u>The Edgware Growth Area SPD will remain a material consideration within its geographical scope (including LB Harrow land as shown within mapping in the SPD), but polices within this Local Plan are unable to apply within the LB Harrow administrative area.</u></p> <p>Para 4.18.4 – last sentence</p> <p>This should include taking account of the relationship with the settings of the Grade II listed Railway Hotel and the Watling Estate Conservation Area <u>together with the Canons Park Conservation Area and the Edgware High Street Conservation Area (both located within the neighbouring London Borough of Harrow),</u> to ensure accordance with Policy CDH08.</p>	<p><b>Response from LB Harrow</b></p> <p><b>GSS05C</b> The Council considers that the proposed wording could provide clarification on the area covered by the Edgware Growth Area SPD.</p> <p><b>Response from Save our Edgware</b></p> <p><b>Para 4.18.4</b> The Council considers that this change could improve consistency with the approach at Policy GSS06 where reference is made to</p>

		neighbouring conservation areas in LB Brent.
<b>MM22</b>  <b>GSS06 &amp; Para 4.19.8</b>	<p><b>MM22 GSS06 Aci</b> Reconstruction and upgrading of Colindale Underground Station to increase its capacity and provide a step-free access station, along with additional cycle parking and facilitating the <u>residential led</u> redevelopment of adjacent land owned by TfL and others.</p> <p><b>MM22 Para 4.19.8</b> Colindale Underground Station – renewal of the station with new ticket hall building with step-free access to the platforms, sufficient gate-capacity and additional cycle parking for the growing population in the area. Together with and intensification to take advantage of the high PTAL, facilitating the <u>residential led</u> redevelopment of adjacent land owned by TfL and others.</p>	<p><b>Response from Transport for London - Places for London</b></p> <p>The Council considers that these revisions to MM20 could help further clarify the intentions behind the Colindale Station SPD.</p>
<b>MM27</b>  <b>GSS09 Part B &amp; Para 4.23.2</b>	<p><b>GSS09B</b> - The potential major transport infrastructure upgrades of the West London Orbital (WLO) and Crossrail 2 would provide broad locations for design-led growth in Barnet through developing new stations or upgrading the capacity of existing stations and allowing higher density developments to be achieved <u>or accelerated</u>. Proposals on sites in proximity to these public transport improvements will be expected to deliver a density and quantum of residential units which optimise their potential in accordance with the design-led approach.</p> <p><b>4.23.2</b> The WLO will deliver a passenger service along existing rail tracks between Hounslow/Kew Bridge and Hendon/ West</p>	<p><b>Response from Transport for London – Spatial Planning</b></p> <p>The Council considers that reference to accelerated growth as a consequence of major transport infrastructure such as West London Orbital could be merited.</p>

	<p>Hampstead Thameslink, passing through Old Oak Common, Neasden, Brent Cross West and Cricklewood. The WLO would have positive impacts through <u>supporting and accelerating</u> unlocking housing delivery and creating <u>improving access to</u> leisure, community and amenity opportunities along the corridor. Delivery is expected in years 11 to 15 of this Plan</p>	
<p><b>MM33 Para 5.4.10B</b></p>	<p>All development must make the best use of land by following a design-led approach (London Plan Policy D3) that optimises the capacity of sites. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The Council will therefore assess the capacity of sites under the <u>major development proposals</u> threshold set out in <u>London Plan Policy H5_HOU04</u> to ensure optimum capacity. In undertaking such an assessment, it will also seek to prevent the subdivision of site(s) in the same ownership for the purposes of avoiding the threshold for a contribution to affordable housing.</p>	<p><b>Response from Transport for London - Places for London</b></p> <p>The Council considers that this change helps to clarify the affordable housing threshold in MM33 - para 5.4.10B using the wording from London Plan Policy H5</p>
<p><b>MM36 HOU04 Part C a  Part D a</b></p>	<p>C (a) it is demonstrated that they meet the requirements of the <u>Council's HMO <del>Additional</del> Licensing Schemes...</u></p> <p>D (a) they are located within an area, including town centres and main thoroughfares, that <del>are</del> <b>is</b> also accessible by public transport, cycling and walking;</p>	<p><b>Minor Factual Correction to Part Ca</b></p> <p>Clarification that Council have two Licensing schemes - Mandatory and Additional.</p> <p>Mandatory applies to HMOs occupied by 5 or more people in 2 or more households</p> <p>Additional applies to smaller HMOs not covered by Mandatory licensing. These are HMOs</p>

		occupied by 3 or more people in 2 or more households.  <b>Grammar at Part Da</b>
<b>MM44 Para 6.13.4</b>	'Sustainable design and construction measures must be considered having regard to potential impacts on the significance of a designated heritage asset (see Policy CDH08).'	<b>Response from Historic England</b>  The Council considers that revision to MM44 could make the policy more consistent with NPPF.
<b>MM46 CDH04 Part E</b>	"All new proposals must meet the requirements of the Building Safety Act 2022 with clear lines of responsibility for safety during design, construction, completion and occupation of high-rise buildings. Proposals that involve residential buildings over <del>30</del> <u>18</u> metres in height will need to provide two staircases to meet Building Regulations standards on Fire Safety"	<b>Response from Greater London Authority</b>  <b>Update</b>  Change seemingly should be made to align with the update to Approved Document B in March 2024:
<b>MM46 Para 6.18.3</b>	Due to their potential impact, development proposals that include tall buildings must address all relevant parts of Policy CDH04 as well as the requirements listed in the London Plan (Tall Buildings Policy D9) which outlines the issues that proposals for tall buildings should address to <u>avoid and minimise</u> the impacts of such structures.'	<b>Response from Historic England</b>  The Council considers that a revision could help ensure consistency with NPPF and London Plan
<b>MM46 Para 6.18.5</b>	The Council will also expect proposals for tall buildings to reflect the guidance provided in area planning frameworks such as the Edgware Growth Area SPD, and the North Finchley Town Centre Framework SPD <u>and the Colindale Station SPD</u> .	<b>Response from Transport for London - Places for London</b>

		The Council considers that reference should be made to all relevant area based SPDs.
<b>MM49 CDH06</b>	'Basement and below ground development will be considered with regard to the relevant requirements of Local Plan policies CDH01, CDH07, <u>CDH08</u> , ECC01 and ECC02.'	<b>Response from Historic England</b>  The Council agrees that archaeological remains are a relevant consideration for basement and below ground development so cross-ref to CDH08 could be merited.
<b>MM51 CDH08 Opening para</b>	'In accordance with national policy, the Council will ensure that Barnet's designated heritage assets (designated and non-designated), including its conservation areas, statutory listed buildings, scheduled monuments, registered historic parks and gardens, registered historic battlefield, and its non-designated heritage assets ( <del>referred to in Barnet as local heritage assets</del> ) ( <u>including assets on Barnet's Local Heritage List</u> ) are conserved and enhanced in a manner appropriate to their significance.'	<b>Response from Historic England</b>  The Council considers that the proposed revision helps to clarify the position of what is considered a non-designated heritage asset
<b>MM51 CDH08 Part A c)</b>	the above criteria a) and b), will also be applied where development either inside or outside a conservation area (within its setting) has a harmful impact on its character, appearance <del>or</del> <u>and</u> significance, including where there would be adverse effects to buildings, trees, landscaping or open space, including gardens, that contributes positively to its significance.'	<b>Response from Historic England</b>  The Council consider it useful through this minor change to reflect on the duty under Section 72(1)
<b>MM51 CDH08</b>	E. <u>Non-Designated</u> Local Heritage Assets	<b>Response from Historic England</b>

<p><b>Part E</b></p>	<p>The Council will conserve <del>local</del> <u>non designated</u> heritage assets (including assets on Barnet's Local Heritage List) and their settings in a manner appropriate to their significance.</p>	<p>The Council believe that these changes, adequately captures distinctions between non-designated heritage assets on Barnet's Local Heritage List and other non-designated heritage assets</p>
<p><b>MM51</b> <b>Para 6.23.3</b></p>	<p>"In determining applications for planning permission that affect <u>the significance of</u> heritage assets, <u>including any contribution made by their</u> or their settings'</p>	<p><b>Response from Historic England</b></p> <p>The Council agrees that revision will help considers that the revision could help to ensure consistency with NPPF and London Plan</p>
<p><b>MM51</b> <b>Para 6.32.1</b></p>	<p>'Barnet has a Local Heritage List which <u>formally</u> identifies buildings of historic or architectural interest. The Council may <u>also</u> identify any non-designated heritage asset as part of the decision-making process on planning applications'<sup>1</sup> <del>(see NPPG para: 039 Reference ID: 18a-040-20190723).</del>'</p>	<p><b>Response from Historic England</b></p> <p>The Council believe that these changes, adequately captures distinctions between non-designated heritage assets on Barnet's Local Heritage List and other non-designated heritage assets</p> <p><b>Minor Correction</b> NPPG ref converted to footnote</p>
<p><b>MM57</b> <b>CHW01</b> <b>Part B</b></p>	<p>Development (including change of use) that involves the loss of existing community facilities / services will only be permitted if: a) a replacement facility of equivalent or better quality is provided which continues to serve the needs of the neighbourhood and wider community; <u>or</u> b) the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and</p>	<p><b>Response from NHS Property Services</b></p> <p>The Council agrees to this correction with reinstatement of 'or' after clause (a) as it was removed in error. This makes CHW01B</p>

<sup>1</sup> NPPG para: 039 Reference ID: 18a-040-20190723

	facilities to meet future population needs or to sustain and improve services; or	consistent with London Plan Policy S1 F 1).
<b>MM58 Para. 8.19.2A</b>	If the proposal is for a major development between 10 - <del>199</del> <u>149</u> residential units or a proposed floorspace for other uses between 1,000- <del>9,999</del> <u>14,999</u> m <sup>2</sup> it will need to complete Barnet's own screening assessment. This will also apply to Hot Food Takeaways, Adult Gaming Centres, Amusement Arcades, Betting Shops, Payday Loan Shops, Pawnbrokers and Shisha Bars as required by Policy TOW03. If the proposal is greater than this threshold it will be required to complete the more detailed Healthy Urban Development Unit (HUDU) Rapid Health Impact Assessment toolkit.	<b>Minor Correction</b> Change in order to be consistent with change to definition of Large Scale development in Glossary MM78.
<b>MM66 ECC02A Part D</b>	<b>D. Water Courses</b> a) Development proposals adjacent to a river corridor are expected to ensure an adequate buffer zone of at least 10 metres (which should be wider if a tall building is being proposed) between the <u>top of the bank of the</u> water course and the built edge of the development and enable public accessibility.	<b>Response from Environment Agency</b>  The Council considers that the revision to MM66 could make the policy more effective.
<b>MM66 Para 10.13.11 Footnote 53</b>	<del>Residential development over 200 units or a site of 4 hectares or more. Non-residential development over 10,000 m<sup>2</sup></del>	<b>Minor Correction</b>  Footnote deleted. Change in order to be consistent with change to definition of Large Scale development in Glossary MM78. All footnotes updated
<b>MM68 ECC04</b>	Insert footnote after end of Playing pitches  <b><u>Refer to Playing Pitch Strategy Review and Action Plan 2023</u></b>	<b>Response from Sport England</b>  The Council considers that cross-reference to the updated Playing Pitch Strategy could make ECC04 more effective.



<p><b>MM68</b></p> <p><b>Para 10.17.4</b></p> <p><b>Para 10.21.1</b></p>	<p>Para 10.17.4</p> <p>Playing Pitch Strategy <del>2017</del> <b><u>Review and Action Plan 2023</u></b></p> <p>Para 10.21.1</p> <p>The Playing Pitch Strategy (<del>2017</del>) <b><u>Review and Action Plan 2023</u></b> highlights that despite good geographical coverage there is demand for additional provision because of issues related to the quality of the existing pitches (mainly due to poor drainage) and accessibility.</p>	<p><b>Factual Update</b></p> <p>.</p>
<p><b>MM68</b></p> <p><b>Para 10.21.1</b></p>	<p>The Borough contains one Site of Special Scientific Interest (SSSI) – the Welsh Harp (Brent Reservoir) - into which the River Brent and Silk Stream flow. The Reservoir was created in 1835 as a water supply for the canal network and is jointly managed by Barnet and Brent Councils with the Canal and River Trust. <u>(the charity that owns and cares for the canal network in England &amp; Wales)</u> who own the water space. As the largest expanse of water in Barnet, it provides an important recreational resource as well as a valuable wildlife habitat. Access to the Welsh Harp (Brent Reservoir) is being improved as part of the regeneration proposals for the West Hendon Estate. Any increased access to the Welsh Harp will be managed appropriately in <u>line with the Welsh Harp Joint Vision and in partnership with the Welsh Harp’s Strategy Group community’s Vision for the Harp’</u> and in consultation with <u>the Canal and River Trust and</u> Natural England to ensure its integrity as a SSSI is maintained.</p> <p>Add a footnote to last sentence with a link to the Joint Vision which was published in July 2023</p> <p><a href="https://canalrivertrust.org.uk">The Welsh Harp/Brent Reservoir Vision   Canal &amp; River Trust (canalrivertrust.org.uk)</a></p>	<p><b>Response from Canal and River Trust</b></p> <p>To clarify the role of the Canal and River Trust in managing the Welsh Harp as well as highlighting the Welsh Harp Joint Vision</p>

<p><b>MM70</b> <b>ECC06</b> <b>Part E</b> <b>Table 18</b></p>	<p>E. Ensuring developers shall take a holistic approach to delivering BNG, Urban Greening Factor, and SuDs within the scheme to maximise opportunities to enhance the multiple benefits these requirements deliver for communities and nature. All developments shall comply with the Urban Greening Factor target scores set out within London Plan Policy G5 <u>and should seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context in line with London Plan Policy G6.</u> The Council encourages the provision of measures that enhance and support biodiversity, creating multiple benefits, including social benefits, and integration into the wider London networks to meet-the target scores and SUDs schemes that maximise biodiversity benefits_and</p> <p>Table 18 – new row</p> <p><u>Development proposals should seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context in line with London Plan Policy G6.</u></p> <p><u>Development scale: All</u></p>	<p><b>Response from Barnet &amp; Enfield Swifts Group</b></p> <p>The Council considers that specific cross-reference to London Plan policy G6 could make ECC06 more effective and necessitates revision to Table 18.</p>
<p><b>MM72</b> <b>TRC02</b> <b>Part A</b></p>	<p>c) An upgraded and enlarged Colindale Underground station <u>providing step free access</u> and <u>enhanced public transport interchange</u></p>	<p><b>Response from Transport for London – Spatial Planning</b></p>

	d) A new London Overground_passenger rail line – <u>the West London Orbital</u> together with upgrades to existing stations (Cricklewood and Hendon)_and the new station at Brent Cross West)	The Council considers that revision to MM72could be merited in order for it to be consistent with GSS01B.
<b>MM76 Table 24 Row 7</b>	<b>Target</b> All new HMOs meet requirements of the <u>Council’s Additional Licensing Schemes</u>	<b>Minor Correction</b> To ensure consistency with correction to MM36
<b>MM78 Glossary</b>	<b>Major Developments:</b> 10 or more residential units (or if a number is not given, <del>where the area is more than</del> <u>0.5 hectares or more</u> ), or 1,000 m2 (or more) gross commercial floorspace.	<b>Minor Correction</b> Ensure consistency with NPPF
<b>MM105 Site 24</b>	Site requirements and development guidelines box revised to state: “Sensitive design is vital to conserve <del>and</del> <u>or</u> enhance the <u>significance of the adjacent</u> Grade II listed station building and adjacent Hampstead Garden Suburb Conservation Area <u>including any contribution made by</u> <del>and</del> their settings.”	<b>Response from Historic England</b>  The Council considers that the site requirements could be made more effective with new wording
<b>MM108 Site 27</b>	The Council proposes the following modifications  Site Description (add after 1 <sup>st</sup> sentence)  <u>The Watling Estate Conservation Area is to the south of the site, while within Harrow, the Canons Park Conservation Area lies to the northwest and the Edgware High Street Conservation Area is to the west.</u>  Site requirements and development guidelines (new sentence to add to 4 <sup>th</sup> para)  <u>In particular, the potential impact of any tall buildings on the setting of the Watling Estate Conservation Area, Canons Park Conservation Area and Edgware High Street Conservation Area must be considered to ensure that the significance of the heritage assets is conserved or enhanced.</u>	<b>Response from Save our Edgware</b>  The Council considers that the modification proposed is consistent with approach for proposal sites 11 and 12 where reference is made to neighbouring conservation areas in LB Brent.

<b>MM109</b>  <b>Site 28</b>	<p>The Council proposes the following modifications</p> <p>Site Description (add after 4<sup>th</sup> sentence)</p> <p><u>Within Harrow, the Canons Park Conservation Area lies to the northwest and the Edgware High Street Conservation Area is to the west.</u></p> <p>Site requirements and development guidelines</p> <p>Proposals must carefully consider the context of the adjacent Watling Estate Conservation Area, <u>together with the Canons Park Conservation Area and Edgware High Street Conservation Area (within Harrow), to ensure that the significance of nearby heritage assets are conserved or enhanced,</u> and the relationship with low-rise suburban housing.</p>	<p><b>Response from Save our Edgware</b></p> <p>The Council considers that the modification proposed is consistent with approach for proposal sites 11 and 12 where reference is made to neighbouring conservation areas in LB Brent.</p>
<b>Appendix A2</b>		
<b>Additional Modifications - Factual Updates and Minor Corrections Only</b>		
<b>Relevant MM &amp; Policy or Para</b>	<b>Proposed Additional Modification</b>	<b>Reason for Additional Modification</b>

<b>Para 2.6.2</b>	The Council supports <del>'Vision for the Harp'</del> the <u>Welsh Harp Joint Vision</u> and will work in partnership to deliver proper protection for the Welsh Harp. Any increased access to the Welsh Harp will be managed appropriately in partnership with the <u>Welsh Harp's Strategy Group</u> <del>community's Vision for the Harp'</del> and in consultation with the <u>Canal and River Trust and</u> Natural England to ensure its integrity as a SSSI is maintained.	<b>Factual Update</b> Ensures consistency with change to MM68.
<b>MM13 GSS01 Part B</b>	d) New <u>London Overground</u> passenger rail line - the West London Orbital <del>Line</del> together with upgrades to existing stations (Cricklewood and Hendon) <u>and</u> new station at Brent Cross West);	<b>Response from Transport for London - Places for London</b>  The Council considers that revision provides more clarity on West London Orbital.
<b>MM15 Para 4.9.4 Penultimate sentence</b>	The 2014 a revised Section 73 planning <u>permission</u> <del>application</del> made was approved making changes to the development around Brent Cross Shopping Centre and the phasing of the development.	<b>Factual Update</b>
<b>Para 4.12.2</b>	Outline consent is also in place for <del>395,000</del> <u>395,297</u> m2 of office space to create a new commercial <u>uses</u> <del>quarter</del> around the new Thameslink Station at Brent Cross West, as well as small business spaces adjacent to the new high street to support business start-ups.	<b>Minor Correction</b> Need for consistency with changes to GSS02

**Section 4.15  
Responding  
to Future  
Changes and  
Challenges**

4.15.1 Delivering comprehensive development of the Brent Cross Growth Area will be dependent on factors relating to land ownership, viability and phasing, all of which can have an impact on the timing and sequence of delivery. The scheme is expected to take over 20 years to deliver and will therefore need to deal with and respond to changes in economic, market and technological conditions over this time. ~~The existing outline planning permission, for Brent Cross Cricklewood, originally approved in 2014 2010, is now nearly a decade old and whilst it is~~ has flexibility to allow the phasing and delivery sequence of the development to be adjusted. The mechanisms within the permission have been successfully used to ensure that the delivery of the development is able to respond to changes such as the early delivery of the Brent Cross West station. However, it is also expected that the 2014 planning permission ~~it~~ will need to be supplemented through further planning applications to update areas of the masterplan as it ~~is evolved~~ evolves and as the development responds to updated market and policy shifts.

4.15.2 To enable this, the Council's approach is to create a sufficiently flexible planning policy framework for the Brent Cross Growth Area capable of responding to change in the long-term and to deliver a successful and sustainable scheme. To support future planning applications within the Growth Area, the Council will review the 2005 Cricklewood, Brent Cross and West Hendon Development Framework and introduce a new Development Framework for the area ~~to reflect the updated masterplan and respond to changing circumstances around the Brent Cross Shopping Centre. This will~~ provide more detailed advice and guidance on the interpretation of policies in the Local Plan.

4.15.3 In order to achieve comprehensive development of the Brent Cross Growth Area the Council will seek to ensure that development ~~of the different strategic areas~~ within the Growth Area is co-ordinated. All developers will be expected to contribute towards the

**Omission**

Supporting text at section 4.15 agreed with Inspectors but omitted in error from Main Modifications. Text is consistent with changes at Policy GSS02 Part D.

	<p>cost of delivering infrastructure within and associated with the Brent Cross Growth Area. Planning applications for new or revised developments within the Brent Cross Growth Area will be expected to contribute to the funding and delivery of infrastructure through Section 106 agreements and CIL. <del>Where appropriate, the Council will secure contributions towards the retrospective costs of infrastructure delivered in earlier phases of the development. The Council will review its CIL charging schedule and may consider a specific CIL rate from developments in the Brent Cross Growth Area.</del> <u>The Council will work with developers to negotiate section 106 contributions in the Brent Cross Growth Area on a case by case basis having regard to any cumulative impacts, in line with government guidance and the tests in Regulation 122 of the CIL Regulations 2010 (as amended). This will help ensure that infrastructure to support development is provided at appropriate times and that all relevant developments make necessary contributions towards the costs of infrastructure.</u></p> <p>4.15.4 <del>The Local Plan will establish</del> <u>sets out</u> a series of indicators to monitor progress on Brent Cross Growth Area, <del>and set appropriate</del> <u>These include</u> milestones for assessing the delivery of the regeneration <u>particularly in terms of new homes, transport infrastructure and progress towards becoming a Metropolitan Town Centre, and setting out the stages where a review of GSS02 or introduction of a new planning framework may be necessary to further comprehensive redevelopment. The Council will facilitate an early review of the Local Plan. It will also review the 2005 Development Framework and introduce a new planning framework Supplementary Planning Document. Early review of the Local Plan together with the new SPD will help to provide more detailed advice and guidance in respect of Local Plan policy for the Brent Cross Growth Area and development sites within.</u></p>	
<b>MM16</b>	Development proposals will be required through detailed design,	<b>Minor Correction</b>

<p><b>Para 4.16.4</b></p>	<p>planning conditions and/ or contributions secured through planning obligations / legal agreements to deliver or contribute to identified infrastructure including junction improvement between the A5/Edgware Road and A406/North Circular, pedestrian and cycle routes to the new Brent Cross West Station, facilities for public transport interchange outside the new station with associated improvements to local bus infrastructure and a new public square, and improved public realm along the A5 Edgware Road. Development sites around the new Brent Cross West station will be expected to provide new public open space alongside new public transport interchange facilities and new pedestrian and cycling connections to the station, <del>and to</del> <u>supporting</u> connectivity and accessibility. Geron Way will need to be widened and upgraded to accommodate new and extended bus services to the new interchange and Brent Cross West as well as access to the future West London Orbital <u>services station</u>.</p>	<p>Grammar</p>
<p><b>Para 4.16.8</b></p>	<p>The Brent Cross West (<u>Staples Corner</u>) Growth Area adjoins the Staples Corner Strategic Industrial Location in LB Brent which is identified in the Brent Local Plan as a Growth Area for industrial intensification and potential housing delivery. Therefore, the Council will seek to develop plans for growth in cooperation with <u>LB Brent Council</u> and ensure that a coordinated masterplan <u>planning framework, such as a Supplementary Planning Document</u> for the area is prepared. <u>This planning framework will help to provide more detailed advice and guidance in respect of Local Plan policy for the Brent Cross (Staples Corner) Growth Area and development sites within.</u> All developments on sites within the Brent Cross West (<u>Staples Corner</u>) Growth Area and the adjoining Staples Corner Growth Area in Brent will be expected to contribute proportionately towards the cost of delivering the infrastructure improvements necessary to support this growth.</p>	<p><b>Omission</b> Supporting text at para 4.16.8 agreed with Inspectors but omitted in error from Main Modifications. Text is consistent with changes at Policy GSS03.</p>
<p><b>MM20 Para 4.18.1</b></p>	<p>The centre is situated in the north-west corner of Barnet <del>and</del> with a small part extending into Harrow.</p>	<p><b>Minor Correction</b></p>



		Council acknowledges that a minor change to the 2 <sup>nd</sup> sentence is required
<b>Para 4.20.1</b>	The Mill Hill East area, <del>the extent of which is set out in Map 3E</del> , is a green, suburban location that includes the planning designations of Green Belt and the Mill Hill Conservation Area.	<b>Minor Correction</b> Need for a cross reference to Map 3E
<b>MM24 Para 4.20.3</b>	The 40 hectares of former <del>RAF</del> <u>military</u> barracks and a former Council depot.	<b>Response from Mike Lambert</b> Minor factual update
<b>Para 4.21.3</b>	An approach of site infilling and intensification supported by Design <del>Guides</del> <u>Codes</u> will enable town centre locations to contribute towards the Borough's growth needs.	<b>Minor Correction</b> Ensures consistency with MM change at para 4.21.6
<b>Para 4.26.4</b>	<del>Emerging regulatory and technological changes are likely to have a significant impact over the lifetime of the plan. Regulation to reduce emissions from vehicles, combined with a rise in the use of electric vehicles, is likely to lower air pollution and noise levels around Barnet's major roads, leading to a much improved environment. This in turn will support a better and more intensive use of locations for residential and other uses.</del>	<b>Minor Correction</b> This para is superfluous as it has been replaced by MM29 para 4.26.2A
<b>MM37 Para 5.15.3</b>	Long term vacant dwellings ( <u>vacant</u> over 6 months) can compromise the supply of homes for people to live in as well as erode community cohesion.	<b>Minor Correction</b> Clarification that dwelling should be vacant for over 6 months.
<b>MM44 Para 6.13.3 Footnote 25</b>	REEAM New Construction and BREEAM (Refurbishment) represent the suite of environmental assessment schemes that are nationally managed by the Building Research Establishment (BRE) <sup>25</sup> .  <del>25 This SPD will replace two existing SPDs on Residential Design Guidance and Sustainable Design and Construction</del>	<b>Minor Correction</b> Deletion of footnote reference to replacement of existing SPDs as it has already been highlighted at GSS01E and footnote is not relevant to this sentence
<b>MM46 CDH04A</b>	A. Tall buildings (8 storeys and above or 26 metres and above ground level) may be appropriate in the following locations: <ul style="list-style-type: none"> <li>• Brent Cross Growth Area (Policy GSS02);</li> <li>• Brent Cross West (<u>Staples Corner</u>) Growth Area (Policy GSS03);</li> </ul>	<b>Minor Correction</b>  Clarification on title of Growth Area

<p><b>MM50 CDH07A</b></p>	<p><b>A.</b> Provision is made for Sustainable Drainage Systems in accordance with Policy ECC02A03.</p>	<p><b>Minor Correction</b></p> <p>Signalling change to ECC policy numbers arising from ECC02A. This will be reflected in adopted version of Plan.</p> <p>Clarification as Policy ECC02 already has an A section</p>
<p><b>MM51 Para 6.26.3</b></p>	<p>The setting of a listed building is not fixed and may change as the asset and its surroundings evolve. The setting itself is not designated and its importance depends entirely on the contribution it makes to the significance of the heritage asset or its appreciation. New development can impact on the setting of listed buildings and any adverse impact will require clear and convincing justification. Historic England has produced guidance on managing change within the setting of heritage assets and proposals will be expected to be in line with this guidance.<sup>2</sup></p>	<p><b>Update</b></p> <p>New footnote added to make reference to Historic England Advice Note 18 - Adapting Historic Buildings for Energy and Carbon Efficiency</p> <p><a href="#">Adapting Historic Buildings for Energy and Carbon Efficiency   Historic England</a></p>
<p><b>MM51 Para 6.33.1</b></p>	<p>The Council will consult with <del>Historic England</del> and GLAAS on the implications of development proposals in APAs. GLAAS holds further information on archaeological sites in Barnet.”</p>	<p><b>Response from Historic England</b></p> <p>The Council considers that it would be appropriate to clarify that GLAAS is part of Historic England</p>
<p><b>MM51 Para 6.33.3</b></p>	<p>Archaeology and <del>Scheduled Monuments</del></p>	<p><b>Correction</b></p> <p>Scheduled Monuments are a designated heritage asset. Within the Plan the relevant text on Scheduled Monuments is at para 6.30.1 which is within the Designated Heritage Assets section</p>

<sup>2</sup> [Historic England Advice Note 18 - Adapting Historic Buildings for Energy and Carbon Efficiency](#)

<b>MM55 Policy TOW03B</b>	a) Are separated from any existing unit in this group by at least two units which are in a different use (from those highlighted in <b>B (b)</b> ) and hot food takeaway uses).	<b>Minor Correction</b> Clarification on the correct part B
<b>Para 9.7.6 Footnote 38</b>	<del>An employment led development is one where the employment generating (as defined by ECY01) floorspace is greater in proportion to the other uses proposed on the site,</del>	<b>Minor Correction</b> Footnote deleted as it is superfluous given that this is explained at para 9.9.4.
<b>MM65 Table 16</b>	A Noise Impact Assessment is required for proposed residential development which is likely to be exposed to significant noise and/or vibration or cause a noise and/or vibration impact. For all noise sensitive and noise creating developments the Council will refer to the standards set out for internal and external noise levels in BS8233 <sup>3</sup> (2014) and to the approach of BS4142 <sup>4</sup> :2014 (2019). As well as the Noise chapter of the PPG. Such assessments should be provided at application stage for sites where the noise impact is high.	<b>Minor Correction</b> Clarification through new footnote to explain British Standards (BS)
<b>MM70 Para 10.25.2</b>	The Welsh Harp (Brent Reservoir) is designated as a Site of Special Scientific Interest (SSSI) as it is an important refuge and breeding site for waterfowl and other birds. As the largest expanse of water in Barnet, it provides a valuable wildlife habitat. The Council supports the <u>Welsh Harp Joint Vision</u> <del>'Vision for the Harp'</del> and will work in partnership to deliver proper protection for the Welsh Harp (Brent Reservoir).	<b>Factual Update</b> To make correct reference to the Vision from July 2023
<b>MM71 Para 11.4.2</b>	The Government in 2023 announced Levelling Up funding <u>to increase passenger capacity at</u> for the redevelopment of the existing Colindale Underground station <u>(including provision of a new, larger ticket hall and step free access)</u> . Funding has also been provided for the new station <u>upgrade</u> (which is expected to open in 2024) by	<b>Response from Transport for London - Places for London</b> Reflecting progress on Colindale Station

<sup>3</sup> BS4142 is a method to assess the impact of industrial sound on humans in residential premises

<sup>4</sup> BS82233 provides guidance on sound insulation and noise reduction for buildings

	<p>contributions from the Peel Centre development as well as from the Council and TfL. <u>The new station entrance will open in autumn 2025.</u> The redevelopment, which is being taken forward in partnership with TfL, will increase station capacity to meet the needs of the growing population, create step-free access and support sustainable transport choices.</p>	
<p><b>MM73</b> <b>Para 11.12.6</b></p>	<p>Where necessary within CPZs the Council will restrict new residential occupiers from obtaining car parking permits through a planning obligation in a legal agreement. The specific approach in the legal agreement will depend on the PTAL of the site and whether the site is within a Metropolitan or Major Town Centre or in an Opportunity Area identified in the London Plan, as the Council will apply the maximum standards set out in Table 20, as a cap on the number of CPZ permits able to be applied for per property. The cap in the planning obligation will also depend on the number of spaces that are provided within the development itself. In some cases it could be appropriate to block the occupiers from obtaining CPZ permits through a planning obligation in a legal agreement, in other cases it may be appropriate to impose a cap per dwelling which is aligned to the standards in Table 20, also enforced through a planning obligation in a legal agreement. The Council may seek to ensure that new or updated CPZs become effective prior to the occupation of a development proposal where unacceptable impacts on local highway conditions would otherwise result. In order to determine the suitability of parking arrangements, the Council promotes the use of the parking survey methodology set out in the guidance produced by Lambeth Council<sup>21</sup>, which is an industry accepted method for parking assessments. <del>The Council may seek to ensure that new or updated CPZs become effective prior to the occupation of a development proposal where unacceptable impacts on local highway conditions would otherwise result.</del></p>	<p><b>Minor Correction</b> Removal of duplication</p>
<p><b>Para 12.4.4</b> <b>Footnote 72</b></p>	<p><del>The government set out in the Planning White Paper in summer 2020 that it intended to reform s106 and the Community Infrastructure Levy. The 2021 Queen Speech included reference to a new Planning</del></p>	<p><b>Minor Correction</b></p>

	<p><del>Bill which includes “Replacing the existing systems for funding affordable housing and infrastructure from development with a new more predictable and more transparent levy”. At the time of writing, there is limited information available about how the new levy will work in practice and when it would be introduced.</del></p>	<p>Local Plan needs to reflect existing legislation rather than highlighting potential reforms.</p>
<p><b>MM86 Site 4</b></p>	<p><b>Ownership:</b> Council / <u>NHS Property Services</u></p>	<p><b>Response from NHS London Healthy Urban Development Unit (HUDU)</b></p> <p>Minor Correction</p>
<p><b>MM104 Site 23</b></p>	<p><b>Planning Designations</b> ‘Listed Buildings’.</p> <p><b>Site Description:</b> ‘The site contains a <u>two</u> Grade II listed buildings...’ and</p> <p><b>Site requirements and development guidelines :</b></p> <p>The building is in use as a child-care nursery, providing the community use on the site. Residential development to the rear of the site must conserve or enhance the setting of the listed buildings. While pedestrian access is good, including a pathway directly to the nearby station, proposals for residential use at the rear of the site must resolve the issue of restricted access for any car parking and service vehicles. The site should be subject to an archaeological assessment.</p>	<p><b>Response from Historic England</b></p> <p>The Council acknowledges that site contains two listed buildings</p>
<p><b>MM127 Site 47</b></p>	<p><b>Site requirements and development guidelines:</b></p> <p>The varied surroundings to the site mean that the design and height must be sensitive in terms of <u>intensification</u>; for example, the southern boundary towards the supermarket provides greater scope for building height than towards the low-rise housing to the west.</p>	<p><b>Response from Transport for London - Places for London</b></p> <p>Minor Correction</p>

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