

**Local Development  
Framework  
Development  
Management Policies  
DPD  
Representation Report  
Preferred Approach**

Revised 30/09/2011

May 2011

The core of all representations received from the Development Management Policies preferred approach are included in this Representations Report. The full responses are available for inspection in the planning offices at North London Business Park. Please contact the Programme Officer – Mrs Vijaya Ram (Mobile: 077914 59178, [Vijaya\\_ram@btinternet.com](mailto:Vijaya_ram@btinternet.com)) to make an appointment to inspect the responses. The Inspector also has a full copy of all submissions received.

## Representors DM Policies Preferred Approach

Representor Number	Title	Initials	Surname	Company/Organisation
577	Miss	Rose	Freeman	Theatres Trust
578	Mr	Aaron	Peate	A2 Dominion Homes.
579	Mr	Michael	Meadows	British Library
580		Pauline	McKinnell	Cricklewood Community Forum
581	Mr	Paul	Keywood	Legal & General
582	Mr	Warren	Forsyth	Middlesex University
583		Amandeep	Kellay	Turley Assoc.
584		Carolyn	Wilson	Mobile Operators Association (MOA)
585	Mr	S	Canning	Watchtower
586	Mr	Mark	Mathews	Thames Water Property Services
587		Mel	Barlow Graham	London Fire and Emergency Planning Authority (LFEPA)
588	Mr	Philip	Murphy	BXC Development Partners
589	Mr	Matt	Parr	Environment Agency
590	Mr	Alun	Evans	Metropolitan Police Authority/Service (MPA/S)
591	Mr	Derek	Epstein	The Barnet Society
592	Mr	Glen	Rollings	GLA
593	Mr	Derrick	Chung	WHRA & FYP
594		Jan	Charman	NHS Barnet
595	Mr	Graham	Saunders	English Heritage
596	Mr	Bob	Popat	Riverglade Estates Ltd.
597	Cllr	Jim	Tierney	Labour Group
598	Mr	S.H	Price	Mays Lane Gospel Hall Trust
599	Mr	Peter	Pickering	Peter Pickering
600	Miss	Rachael	Bust	The Coal Authority
601		Rebecca	Burnhams	Universities Superannuation Scheme (USS)
602	Mr	Mike	Dawson	Finchley Society
603				Asda Stores Ltd
604	Mr	Chris	Thomas	Outdoor Advertising Association (OAA)
605		Kate	Kerrigan	Consortium of Registered Providers (RPs), Home Group, One Housing Group and Origin Housing
606		Helen	Massey	Barnet Residents Association
607	Mr	Patrick	Blake	Highways Agency

**Representation No: 577 / 1**

**Name :** Miss Rose Freeman

**Organisation :** Theatres Trust

**Policy** Policy DM13: Community and education space

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Although not a Use Class, please note at para.12.1.4 that while cinemas are Use Class D2, theatres are sui generis. If Use Classes are to be advised in this document the information should be accurate and include sui generis.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The supporting text has been amended to reflect that theatres are a sui generis community use. Further detail has also been added in table 6 listing town centre sui generis uses.

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**Representation No: 577 / 2**

**Name :** Miss Rose Freeman

**Organisation :** Theatres Trust

**Policy** Policy DM13: Community and education space

**Chapter:**

**Paragraph:**

table 6

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**Reason for Objecting or Supporting?:**

Other typical high street uses are launderettes, taxi businesses, amusement arcades, petrol stations and nightclubs (not to mention theatres) which are all sui generis and these uses should be included for efficiency and accuracy in a Development Management document.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The supporting text has been amended to reflect that theatres are a sui generis community use. Further detail has also been added in table 6 listing town centre sui generis uses.

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**Representation No: 577 / 3**

**Name :** Miss Rose Freeman

**Organisation :** Theatres Trust

**Policy** Policy DM13: Community and education space

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

As suggested for the Core Strategy document, we feel that for clarity an explanation of the term 'community facilities' would be beneficial and recommend - community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The introduction to the policy has been expanded to include an explanation of the role of community facilities.

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**Representation No: 577 / 4**

**Name :** Miss Rose Freeman

**Organisation :** Theatres Trust

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Thank you for including cultural uses and the arts in this policy regarding support for new and relocation of existing venues in town centres. However, under the sub-heading of Evening Uses we suggest some robust guidance be added for leisure usage other than for just retail.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The supporting text has been revised to include a wider reference to evening economy uses such as theatres as well as other leisure activities.

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**Representation No: 578 / 1**

**Name :** Mr Aaron Peate

**Organisation :** A2 Dominion Homes.

**Policy** Policy DM08: Ensuring a variety of sizes of new homes to meet housing need

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

We note that Preferred Policy DM 06 confirms that development should provide a mix of dwelling types and sizes in order to provide choice for a growing and diverse population for all households in the Borough. Preferred Policy DM 06 goes on to identify the following dwelling size priorities:

- For market housing – homes with 4 bedrooms are the highest priority, homes with 3 bedrooms are a medium priority;
- For social rented housing – homes with 3 bedrooms are the highest priority; and
- For intermediate affordable housing – homes with 4 bedrooms are the highest priority and smaller 1, 2 and 3 bedroom units will be supported.

Not all locations will be suitable for all types of housing. Given the higher density housing planned for areas in Colindale, Brent – Cross Cricklewood and Mill Hill East, that family sized homes should be sought elsewhere in the Borough.

In essence, each site should be considered on its own merits and accordingly there should be a degree of flexibility in relation to the preferred mix of housing to reflect the characteristics of a site and the surrounding area. For example, a location inappropriate for larger dwellings should not be required to provide any.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

In line with the Core Strategy the objective is to provide housing choice to meet the aspirations of existing and future residents. The supporting text states that the policy can be applied flexibly.

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**Representation No: 578 / 2**

**Name :** Mr Aaron Peate

**Organisation :** A2 Dominion Homes.

**Policy** Policy DM10: Affordable housing contributions

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Preferred Policy DM 08 confirms that all development providing 15 or more units will be required to achieve on-site subject to viability, a minimum of 30% affordable housing.

Given the need to be in conformity with London-wide targets we consider that the Council should retain its existing UDP polices relating to these matters such that the maximum amount of affordable housing should be required on a site subject to viability.

However, we also consider that there are instances where there should be flexibility in providing the quantum and type of affordable housing within a scheme and this depends on the viability of the scheme being proposed. For example there will be a greater degree of viability in providing more affordable housing than is requested when there is more housing grant available.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The 30% target is a minimum subject to viability. Further detail will be provided in a revised Affordable Housing Supplementary Planning Document.

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**Representation No: 579 / 1**

**Name :** Mr Michael Meadows

**Organisation :** British Library

**Policy** Policy DM01: Protecting Barnet's character and amenity

**Chapter:**

**Paragraph:** 2.5.2

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**Reason for Objecting or Supporting?:**

The BL welcomes paragraph 2.5.2 which allows for exceptions in large scale regeneration areas such as Colindale.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

We welcome this support.

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**Representation No: 579 / 2**

**Name :** Mr Michael Meadows

**Organisation :** British Library

**Policy** Policy DM04: Environmental considerations for development

**Chapter:**

**Paragraph:** 4.4.3

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**Reason for Objecting or Supporting?:**

The BL supports Policy DM03 and welcomes paragraph 4.4.3 and notes that Combined Heat and Power is proposed in the CAAP.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

We welcome this support.

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**Representation No: 579 / 3**

**Name :** Mr Michael Meadows

**Organisation :** British Library

**Policy** Policy DM10: Affordable housing contributions

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The British Library (BL) welcomes policy DM08 which requires that all new development providing 15 or more units will be required to achieve on-site, subject to viability, a minimum of 30% affordable housing. This will ensure that new residential development will be viable and deliverable, particularly in the borough's regeneration areas. The BL notes that further details on financial contributions in lieu of on site provision will be provided in a Supplementary Planning Document.

CAAP Policy 7.2 "Affordable Housing" includes the adopted UDP borough wide target of 50% affordable housing. We understand that this policy will be superseded by Draft Core Strategy Policy CS4 and Development Management Policies DM08. This relationship should be made clear in the Development Management Policies document.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

Within the context of a changing policy environment the 50% target set out in the AAP will be expected to be complied with subject to viability testing.

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**Representation No: 579 / 4**

**Name :** Mr Michael Meadows

**Organisation :** British Library

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The BL request that this wording is amended to reflect the allocations identified in adopted Area Action Plans. Therefore, we propose the following change:  
“Significant new retail and other appropriate town centre use proposals outside the town centres and allocations identified in adopted AAPs, or any expansion of existing out of centre sites, will be refused”

The BL note that the Colindale Avenue Corridor of Change, where the BL newspaper storage facility is located, is not a designated town centre as set out in Appendix 4 of the Development Management policies. CAAP Policy 7.4 proposes that a new neighbourhood centre will be provided in the Colindale Avenue Corridor of Change, with capacity for 5,000sqm of gross retail floorspace including 2,500 sqm new convenience retail floorspace. However, Policy DM09 states:  
“Significant new retail and other appropriate town centre use proposals outside the town centres or any expansion of existing out of centre sites will be refused”.

The BL request that this wording is amended to reflect the allocations identified in adopted Area Action Plans. Therefore, we propose the following change:  
“Significant new retail and other appropriate town centre use proposals outside the town centres and allocations identified in adopted AAPs, or any expansion of existing out of centre sites, will be refused”

This will ensure that the new neighbourhood centre at Colindale and the appropriate town centre uses within it will be delivered. Without this change the objectives of the CAAP will not be met.

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**If you are Objecting, what changes are you seeking?:**

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**Council’s response :**

The supporting text and policy have been amended to include reference to the new neighbourhood centre identified in the AAP.

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**Representation No: 579 / 5**

**Name :** Mr Michael Meadows

**Organisation :** British Library

**Policy** Policy DM15: Green Belt and open spaces

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The BL supports policy DM13 which states that "In regeneration areas, a different approach will be applied to new open space/playing fields provision given the limited amount of Brownfield land and intensity of proposed development that brings forward wider planning benefits, such as indoor sports, recreation or leisure facilities."

The BL is pleased that Policy DM13 recognises the role of the CAAP in addressing open space requirements in Colindale.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

We welcome this support.

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**Representation No: 580 / 1**

**Name :** Pauline McKinnell

**Organisation :** Cricklewood Community Forum

**Policy** Policy DM01: Protecting Barnet's character and amenity

**Chapter:**

**Paragraph:** 2.5.2

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**Reason for Objecting or Supporting?:**

I wish to change the exempt areas i.e. the large scale regeneration areas such as Brent Cross Cricklewood and Colindale. The approach of design being compatible with its surroundings should include all developments.

That is: I consider that to make exemptions will negate the basic principle of respecting Barnet's predominately suburban character because the areas of large-scale regeneration will impact on the wide areas of Barnet, such as Hendon and Golders Green, and change their character as a direct result of high-rise flatted developments.

Therefore all developments should be in character with the surroundings. Otherwise large areas of Barnet will become like the inner city of London and lose its suburban character irrevocably.

The large-scale regeneration areas will not have to conform in design to the protection of their original character will lead to large areas of Barnet losing its suburban character. The tower blocks will be seen from a long way off and the great increase in population will spill over into wide areas of Barnet affecting traffic congestion in particular.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

Exempting large regeneration areas is necessary to enable these areas to deliver other policy objectives including the delivery of affordable housing, employment opportunities, community facilities and new and improved public open spaces. In these areas contemporary design solutions will be expected to create new urban forms of places and buildings that significantly raise the standards of urban design and environmental performance.

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**Representation No: 581 / 1**

**Name :** Mr Paul Keywood

**Organisation :** Legal & General

**Policy** Policy DM17: Travel impact and parking standards

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Amend text to more closely reflect Policy EC2.1(e) of PPS4 which in planning in sustainable growth areas states local Authorities should co-locate developments which generate sustainable transport movements.

The preliminary text to the policy ("Development which creates a significant transport impact will be expected to locate in the more accessible parts of the borough close to public transport hubs, stations or bus stops") is too broad brush and does not acknowledge Policy EC2.1(e) of PPS4 which in planning for sustainable growth states Local Authorities should co-locate developments which generate substantial transport movements.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

DM17 [previously DM14] has been amended to better reflect the factors which will be considered when assessing accessibility. Proposals which are anticipated to have a significant impact will need to complete a full transport assessment and demonstrate how these effects will be mitigated. Demonstrating co-location may be an appropriate part of this assessment depending on the accessibility of the location.

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**Representation No: 582 / 1**

**Name :** Mr Warren Forsyth

**Organisation :** Middlesex University

**Policy** Policy DM09: Specialist housing

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The University welcomes support for student accommodation however a more explicit reference should be made to the Student Village identified in the Colindale AAP, to ensure consistency between the two documents.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

A reference to the student village in Colindale has been added to the supporting text.

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**Representation No: 582 / 2**

**Name :** Mr Warren Forsyth

**Organisation :** Middlesex University

**Policy** Policy DM12: Maintaining our local centres and parades

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The University welcomes support for the local shopping parade along The Burroughs.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

We welcome this support.

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**Representation No: 582 / 3**

**Name :** Mr Warren Forsyth

**Organisation :** Middlesex University

**Policy** Policy DM13: Community and education space

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Final paragraph could be amended to read, "New Community and educational facilities should be located in town centres, edge of centres, near an established campus, or in a location that is accessible..." in order to ensure consistency with the Core Strategy.

The recommended amendments are to ensure consistency with the Core Strategy.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The Core Strategy in policy CS8: Promoting a strong and prosperous Barnet encourages the provision of new and improved facilities in Barnet and references the Hendon campus. Whilst the campus is accessible by public transport, cycling and walking but any development will need to consider its transport impact in line with DM17: Transport impact and parking standards.

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**Representation No: 582 / 4**

**Name :** Mr Warren Forsyth

**Organisation :** Middlesex University

**Policy** Policy DM17: Travel impact and parking standards

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The University strongly supports the shift in travel away from the private car, however objects to Policy DM14 for the following reasons:

- i) There are no car parking standards in the draft London Plan for Higher Educational Facilities, and therefore provision needs to be made within this policy for car parking to be assessed by the development of a Travel Plan; and
  - ii) The cycle parking standards within the London Plan for Higher Educational Facilities are wholly unrealistic and as such the final sentence of this policy should be amended to read, "Cycle Parking standards will be required in line with the draft revised London Plan or as agreed with the Borough in a Travel Plan"
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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

We are required to be in general conformity with the London Plan which includes cycle parking standards. Also the London Plan makes clear that parking standards in PPG13 should be used where there is no standard in the London Plan. PPG13 sets out standards for higher education facilities.

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**Representation No: 583 / 1**

**Name :** Amandeep Kellay

**Organisation :** Turley Assoc.

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Out-of-centre development should not be automatically precluded. Policy DM09 states that new retail and expansion of retail out-of-centres will be refused. DM09 should be drafted in accordance with, Planning Policy Statement 4 (PPS4) (December 2009), this policy allows out-of-centre development under certain circumstances. This national policy recognises that there may be circumstances where out-of-centre development is appropriate subject to: impact, sequential approach; and scale.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The policy and supporting text have been revised to include reference to the policy approach in PPS4 including the sequential approach and impact test.

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**Representation No: 584 / 1**

**Name :** Carolyn Wilson

**Organisation :** Mobile Operators Association (MOA)

**Policy** Policy DM18: Telecommunications

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

We welcome the inclusion of this policy and find that it is generally in accordance with PPG8.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

We welcome this support.

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**Representation No: 585 / 1**

**Name :** Mr S Canning

**Organisation :** Watchtower

**Policy** Policy DM09: Specialist housing

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Policy DM07

Specialist housing – Houses in Multiple Occupation, student accommodation and housing choice for older people

This policy addresses the provision within the London Borough of Barnet, for specialised types of housing.

We note however, that a specific group of housing provision is omitted from this policy; that of housing provided within a live/work environment.

Live-Work has become increasingly popular as a vehicle for reducing expenditure on both work premises and housing. Further benefits accrue, such as the convenience of working at home or local to home, and the alleviation of extended distances of travel. This results in a saving of time and money and makes a substantial contribution to the requirement of living a more environmentally sustainable way of life.

National level planning policy contains no specific guidance on Live/Work and Planning Policy Guidance Notes/Statements do not currently refer to Live/Work. However, it is possible to apply certain aspects of national policy when considering Live/Work development, as set out in:

- \* Promotion of mixed-use development (PPS1, Creating Sustainable Communities)
- \* Promotion of mixed-use development and re-use of employment land (PPG3 and 2005 amendments to PPG3, Housing)
- \* Promotion of small businesses and small scale commercial activity in residential areas (PPG4, Industrial, Commercial Developments and Small Firms)
- \* Business Development in residential areas (PPG4, Industrial, Commercial Developments and Small Firms)
- \* Promotion of mixed-use development (PPS6, Town Centres and Retail Development)
- \* Reducing reliance on the car (PPG13, Transport)
- \* Promoting land use measures which enable accessibility by public transport, cycling and walking (PPG13, Transport)

In addition to these national level planning policy references, the current draft of the 'London Plan' (currently undergoing examination) in Policy 3.8 (paragraph f), notes the following responsibility of each local authority in the matter of supported housing:

f other supported housing needs are identified authoritatively and coordinated action is taken to address them in LDF and other relevant plans and strategies

Commenting on this policy statement, paragraph 3.76 of the same draft London Plan says: "Existing sites and premises providing either an element of care, or dedicated homes for employees such as nurses, police officers or hotel staff, are a finite resource and may be threatened by higher value uses. Where shortfalls of specialist housing needs have been identified (Policy 3.8), the possibility of other providers of specialist or supported needs accommodation using the premises should be explored".

The facilities operated by Watchtower in Mill Hill are an excellent example of the live/work strategy, and extend the concept of live/work beyond a simple office in the home into a truly sustainable live/work concept.

The recognition of live/work as a concept that can be used to promote sustainable communities, and the acknowledgement that such communities already exist within Barnet appears to be missing from the existing policy structure. Policy DM07 needs to be inclusive of all specialised housing concepts as directed by Policy 3.8 paragraph f of the draft London Plan, especially those concepts which can assist in delivering other policy objectives outlined elsewhere in planning policy documentation.

In addition to noting the existence of live/work within Barnet, it is important that the policy is supportive of the live/work concept into the future, and both acknowledges and encourages the contribution this type of specialised housing can make towards both housing targets and an environmentally sustainable way of life.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The Use Class Order does not define live work units as a separate use class so they are not recognised as a specialist type of housing. The development of live/work schemes has been abused in the past to convert office space into residential accommodation. Enforcement of a live/work use is difficult to determine. Applications for new live/work schemes would be judged on their merits.

Policy 3.8 f in the London plan is addressing need for specialist accommodation for older people and identifying the possibility that surplus supported housing could provide for other specialist housing. It does not refer to live/work which is not a specialist accommodation.

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## Representation No: 586 / 1

Name : Mr Mark Mathews

Organisation : Thames Water Property Services

Policy Policy DM04: Environmental considerations for development

Chapter:

Paragraph:

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### Reason for Objecting or Supporting?:

Statutory water and sewage undertakers' investment programmes are based on a 5-year cycle, known as the Asset Management Plan (AMP) process. We are currently in the AMP5 period, which runs from 1st April 2010 to 31st March 2015.

Thames Water's funding is regulated by OFWAT. Every 5 years we submit a strategic business plan to OFWAT. OFWAT set the level of charges to our customers and agrees the level of funding available for capital investment projects and the specific projects that we should undertake. Thames Water are then monitored against the delivery of the projects. As a result we base our investment programmes on development plan allocations, which form the clearest picture of the shape of the community (as mentioned in PPS12). However the funding agreed with Thames Water will not always match the investment required to accommodate growth.

Where funding has been provided it takes 1-3 years for minor works, 3-5 years for major upgrades and 5-10 years plus for the provision of complete new water or sewerage treatment works. New development may therefore need to be phased to allow the prior completion of the necessary infrastructure. Phasing of development is even more critical where we have not been funded to provide extra capacity, or for example, to mitigate potential adverse amenity impacts resulting from proposed development adjacent to our sewage works.

Regarding the funding of water and sewerage infrastructure through the planning system, it is our understanding that Section 106 Agreements are not usually suitable to secure water and waste water infrastructure upgrades to provide additional infrastructure. However, it is essential to ensure that such infrastructure is in place to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses, odour and water shortages with associated low pressure water supply problems.

In general terms it is easier to provide infrastructure for a small number of large clearly defined sites than a large number of smaller less well defined

As water and sewerage undertakers also have limited powers under the Water Industry Act to prevent connection to its network ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing or the use of Grampian style conditions.

The draft policy below should be included within the Development Management Policies Document:

"The Council will also seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate infrastructure both on and off the site to serve the development and that it would not lead to problems for existing users or future occupiers.

In some circumstances a drainage strategy will need to be produced by the developer in liaison with Thames Water to ensure the appropriate upgrades are in place ahead of occupation of the development. Where there is a capacity problem or potential adverse amenity impact on future occupiers, and no improvements are programmed by the statutory undertaker, the Council will require the developer to fund in full the appropriate improvements which must be completed prior to occupation of the development.

The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in

accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact and that any such adverse impact is minimised.”

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**If you are Objecting, what changes are you seeking?:**

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**Council’s response :**

The Core Strategy deals with this issue. We will expect any new infrastructure to be included in the Infrastructure Delivery Plan which will inform the CIL charging schedule.

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**Representation No: 587 /**

**Name :** Mel Barlow Graham

**Organisation :** London Fire and Emergency Planning Authority (LFEPA)

**Policy**

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

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**If you are Objecting, what changes are you seeking?:**

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**Council’s response :**

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**Representation No: 588 / 1**

**Name :** Mr Philip Murphy

**Organisation :** BXC Development Partners

**Policy** Policy DM01: Protecting Barnet's character and amenity

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The LFB support Policy DM02 relating to design considerations, which requires all new development to be designed to provide safety and security in the environment. The LFB also note that further detail on residential design will be included in a new Residential Guidance SPD, which will emerge following the adoption of this document. The LFB therefore ask to be informed on the development of this SPD and that they are adequately consulted with in regard to design principals concerning emergency service access and fire safety. This would include giving consideration to installing hard wired smoke alarms in social housing and sprinkler systems where the risks justify it. Efforts to try and reduce crime such as arson through design should also be promoted. Unless opportunities are taken to build safety into any new infrastructure, future growth within Barnet could create additional risks from fire and other emergencies across the Borough.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

We will consult the LFEPA on the Residential Design Guidance SPD.

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**Representation No: 588 / 1**

**Name :** Mr Philip Murphy

**Organisation :** BXC Development Partners

**Policy** Introduction

**Chapter:**

**Paragraph:**

1.1.1

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**Reason for Objecting or Supporting?:**

The following amendment is recommended:-

"This document is part of the Local Development Framework (LDF), which will replace the saved policies<sup>1</sup> in the Unitary Development Plan (UDP) (adopted May 2006), with the exception of Chapter 12 which will continue to be used, along with the Development Framework in respect of Brent Cross Cricklewood, to assess future applications at Brent Cross Cricklewood. Policies were saved in May 2009 the expectation that they will be replaced by fewer policies in the LDF." (paragraph 1.1.1)

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

A new sub heading for Brent Cross Cricklewood has been inserted into the Introduction to make clear the approach to the use of the saved UDP policies with regards to BXC.

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**Representation No: 588 / 2**

**Name :** Mr Philip Murphy

**Organisation :** BXC Development Partners

**Policy** Policy DM17: Travel impact and parking standards

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The LFB support Policy DM14 which notes that “parking proposals that detrimentally affect highway safety or residential amenity will be refused.” The LFB is keen to ensure LB Barnet promote integrated and efficient travel and access to ensure that access for emergency vehicles will not be compromised by future development to allow the LFB to continue to provide the highest class service possible throughout the borough.

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**If you are Objecting, what changes are you seeking?:**

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**Council’s response :**

We welcome this support.

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**Representation No: 588 / 3**

**Name :** Mr Philip Murphy

**Organisation :** BXC Development Partners

**Policy** Policy DM01: Protecting Barnet's character and amenity

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Recommended new wording :-

“All development will be expected to respect existing character.

The following are considerations when assessing any development:

- Scale, mass and height
- Design and materials
- Relationship with adjoining properties and the street scene
- Relationship with the established local character
- High quality landscaping including the retention of existing habitat
- Residential amenity including daylight, sunlight, privacy, noise, outlook and light pollution
- Provision and retention of garden amenity space

Residential conversions in roads characterised by single family occupation will not normally be appropriate.

These considerations are supplemented by all existing and proposed guidance documents, and in respect of Brent Cross Cricklewood Chapter 12 of the UDP and the adopted Development Framework for that regeneration area.”

Policy DM01 seeks to protect Barnet’s character and residential amenity, and states that “all development will be expected to respect existing character”. Whilst the proposals at BXC are sensitive to residential amenity for those properties within and adjacent to the site, BXC is intentionally a transformational development, consistent with the London Plan, UDP and Development Framework. It is therefore important that this policy cross refers to the specific BXC policies.

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**If you are Objecting, what changes are you seeking?:**

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**Council’s response :**

A new sub heading for Brent Cross Cricklewood has been inserted into the Introduction to make clear the approach to the use of the saved UDP policies with regards to BXC.

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**Representation No: 588 / 4**

**Name :** Mr Philip Murphy

**Organisation :** BXC Development Partners

**Policy** Policy DM04: Environmental considerations for development

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Recommended new wording:

"...Proposals to locate noise sensitive development in areas with existing high levels of noise will not normally be permitted, unless satisfactory mitigation is provided..."

The policy deals with the location of noise sensitive development in areas with existing high levels of noise, however, the policy fails to recognise the role that mitigation techniques can play in ensuring acceptable noise conditions are created.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

Reference to providing satisfactory mitigation has been added in paragraph 4.11 As set out in the policy this will be acceptable where appropriate.

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**Representation No: 588 / 5**

**Name :** Mr Philip Murphy

**Organisation :** BXC Development Partners

**Policy** Policy DM07: Protecting housing in Barnet

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The policy recognises at criteria v. that there may be instances where existing housing may be demolished as a result of identified regeneration proposals, in so long as there is a net replacement. Whilst the principle of this criteria is supported, the detail does not reflect the circumstances at BXC and thus a minor alteration is necessary.

"v.Where proposed identified regeneration areas involving large scale demolition of poor quality housing and estates provides for their net replacement."

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

Reference to poor quality housing in regeneration areas has now been removed.

---

**Representation No: 588 / 6**

**Name :** Mr Philip Murphy

**Organisation :** BXC Development Partners

**Policy** Policy DM08: Ensuring a variety of sizes of new homes to meet housing need

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The policy sets out the Council's priorities with regard to mix of dwelling types and sizes, however, it fails to recognise that such priorities will not be applicable to all developments and locations across the borough. To this end it is recommended that the modifications are made to the policy:" Our dwellings size priorities are the following but will be applied on a case by case basis having regard to the particular circumstances of the proposed development including characteristics and densities of Town Centre development:"

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The supporting text states that the approach to housing mix can be applied flexibly.

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**Representation No: 588 / 7**

**Name :** Mr Philip Murphy

**Organisation :** BXC Development Partners

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The policy sets out development principles for town centres and states that “significant new retail and other appropriate town centre use proposals outside the town centres or any expansion of existing out of centre sites will be refused. Edge of centre proposals should demonstrate why they are not locating on a town centre site”. This is not consistent with national Planning Policy Statement 4 (PPS4). Although PPS4 clearly sets out a town centre first policy, it recognises the potential for edge or out of centre development but only where the impact and sequential tests have been satisfactorily addressed. To this end it is necessary to ensure the policy accords with PPS4; "The Council will expect a suitable mix of appropriate town centre uses as part of development within the town centres to support their continued vitality and viability and ensure they are enterprising locations serving their local communities.

Significant new retail and other appropriate town centre use proposals outside the town centres or any expansion of existing out of centre sites will be refused if they are unable to satisfactorily address the tests of PPS4. Edge of centre proposals should demonstrate why they are not locating on a town centre site.

The town centre boundaries are shown in the maps in Appendix 4. Details of the changes to the existing primary and secondary frontages are set out in Appendix 5. The proportions for the frontages will be maintained unless further evidence shows that it needs to change.”

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The policy and supporting text have been revised to include reference to the policy approach in PPS4 including the sequential approach and impact test.

---

**Representation No: 588 / 8**

**Name :** Mr Philip Murphy

**Organisation :** BXC Development Partners

**Policy** Policy DM14: New and existing employment space

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The policy deals with new and existing employment space. Given that the BXC development contains existing industrial employment floorspace to be relocated and proposes new office floorspace, the policy is directly relevant. However, as drafted the policy does not reflect the employment issues that arise at BXC and as a result alterations are necessary:

“The Council will safeguard those existing employment spaces capable of addressing the needs of modern business.

Sites identified as Locally Significant Industrial

Sites and Business Locations identified on the Proposals Map will not be permitted to change from employment space.

Outside these locations loss of employment space will only be permitted where it can be demonstrated to the Council's satisfaction that a site is no longer suitable or viable for its existing business use in the short, medium and long term and a suitable period of active marketing has been undertaken, or its loss is required as a result of wider regeneration proposals.

Loss of office sites in town centres and edge of centre locations will be expected to provide appropriate mixed use re-development which provides community uses and some re-provision of employment floorspace as well as residential where appropriate.

Brent Cross Cricklewood is expected to deliver a large amount of new office floorspace as part of the emerging town centre. New proposals for office space beyond Brent Cross Cricklewood will be expected to consider the town centres first before edge of centre sites [except for Brent Cross/Cricklewood]. Small scale office development will be permitted outside these locations.

New industrial/warehousing space will be expected to locate in Locally Significant Industrial sites. Warehousing uses or uses which generate high levels of traffic movement for deliveries should be located in close proximity to tier one and two roads and minimise impact on residential areas.

In all new employment space on site servicing should be adequate for the intended use and include space for waiting for goods vehicles.”

---

**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The reference in the policy has been removed and new paragraph added to the supporting text which identifies the loss of the industrial land and the new office floorspace which is subject to the BXC planning application and will be treated separately from the approach set out in this policy.

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**Representation No: 588 / 9**

**Name :** Mr Philip Murphy

**Organisation :** BXC Development Partners

**Policy** Policy DM15: Green Belt and open spaces

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The following modifications is recommended:

The policy identifies the exceptional circumstances in which existing open space could be lost, however, for clarity we would recommend the modifications: "...In exceptional circumstances loss of open space will be permitted such circumstances include where the following can be satisfied..."

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The policy clearly sets out the two exceptional circumstances where it's acceptable for open space to be lost. Adding the word include implies that there may be other exceptional circumstances where loss could be acceptable which is not the case.

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**Representation No: 588 / 10**

**Name :** Mr Philip Murphy

**Organisation :** BXC Development Partners

**Policy** Policy DM17: Travel impact and parking standards

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The policy sets out specific parking standards for new development in the Borough. Given that parking standards relating to BXC are already covered in Policy C8 of Chapter 12 of the UDP, therefore additional wording should be added to Policy DM14:  
"Specific parking standards for BXC are addressed in Policy C8 of Chapter 12 of the UDP."

---

**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

A new section has been inserted into the introduction which deals with Brent Cross Cricklewood.

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**Representation No: 589 / 1**

**Name :** Mr Matt Parr

**Organisation :** Environment Agency

**Policy** Policy DM04: Environmental considerations for development

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

We recommend that the last paragraph is amended to clarify whether the referral to “areas identified as prone to surface water run off” relates to flooding from surface water runoff.

We also recommend that it is recognised that it is just as important for this to apply to undeveloped Greenfield sites where surface water runoff rates are currently low.

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**If you are Objecting, what changes are you seeking?:**

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**Council’s response :**

The Policy has been revised to make it clear that it refers to flooding from surface water run off.

Reference has been added to make it clear what a green field rate of run off is and that the London Plan run off hierarchy is expected to be implemented.

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## Representation No: 589 / 2

Name : Mr Matt Parr

Organisation : Environment Agency

Policy Policy DM04: Environmental considerations for development

Chapter:

Paragraph: 4.4.1-4.5.2

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### Reason for Objecting or Supporting?:

Create an additional policy on the river corridors of the Barnet catchment.

#### Section 4

The river corridors of the Barnet catchment (as with the Brent River catchment as a whole) are heavily modified, contaminated with non-native invasive species and endure poor water quality.

We recommend that a policy identifies these problems and seeks for developers to fully restore river's natural functions and that of their flood plain - including wetland habitats.

The policy would be able to help enhance and restore rivers as much as possible by;

1. Improving/protecting the Buffer Zone adjacent to a watercourse as much as possible by setting back development, planting of locally occurring native species and eradicating non-native invasive species. We would also recommend that the policy ensures that lighting (for security/health & safety) doesn't shine directly into the river / river channel and that low lux levels only are used where practically possible.
2. Improving the natural Geomorphology of any watercourse or water body by removing hard structures such as revetments, toe-boarding , weirs etc where appropriate within the river channel. The removal of hard structures in close proximity to a watercourse / water body - or replacement with softer engineering techniques/materials. Developers should be encouraged to de-culvert where practically possible.

#### General recommendations

We recommend that the CL:AIRE code of Practice and SuRF UK would be useful for developers to refer to, these are available at the links below.

#### SuRF-UK Framework Document

The framework document sets out why sustainability issues associated with remediation needs to be factored in right from the outset of a project. It identifies opportunities for considering sustainability at a number of key points in a sites redevelopment or risk management process.

SuRF-UK: A Framework for Assessing the Sustainability of Soil and Groundwater Remediation 2.2MB.

CL:AIRE <http://www.environment-agency.gov.uk/business/sectors/32731.aspx>

Ground source heat pumps could also be looked at a potential alternative energy technology.

A reference to the Thames River Basin Management Plan - ensuring no further deterioration of groundwater quality of groundwater bodies but also aquifers that feed into streams/ rivers.

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### If you are Objecting, what changes are you seeking?:

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**Council's response :**

Additional policy has been added which aims to encourage the naturalisation of the water courses in Barnet wherever possible including a requirement for S106 contributions where appropriate.

Reference to SuRF has been added under Useful Guidance. CL:AIRE will be raised as an issue for the North London Waste Plan which is the relevant DPD.

Reference to the objectives of the Thames River Basin Management Plan has been added.

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**Representation No: 590 / 1**

**Name :** Mr Alun Evans

**Organisation :** Metropolitan Police Authority/Service (MPA/S)

**Policy** Policy DM02: Development standards

**Chapter:**

**Paragraph:**

3.3.1

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**Reason for Objecting or Supporting?:**

Paragraph 3.3.1 of the supporting text of this policy supports the principles of 'Secured by Design' when assessing the design of new developments. However, in order to ensure the policy is consistent with national and strategic guidance, in particular PPS1 and paragraph 4.114 of the London Plan, the MPA/S recommend that a minor amendment is made to the wording of Policy DM02 to ensure that the principles of Secured by Design are applied to all new developments. The MPA/S recommend that the second sentence is amended as follows (additional wording underlined):

The Council will require all new development to be designed to provide safety and security in the environment and reduce opportunities for crime and the fear of crime, in line with Secured by Design principles.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The policy has been amended to ensure reference to compliance with Secured by Design principles.

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**Representation No: 590 / 2**

**Name :** Mr Alun Evans

**Organisation :** Metropolitan Police Authority/Service (MPA/S)

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Policy DM09 states that the Council will expect a suitable mix of appropriate town centre uses as part of development within town centres. It also seeks to protect the change of use of A1 uses and lists a number of acceptable alternative uses which may be acceptable providing the A1 use is no longer viable. The MPA/S supports the inclusion of community uses as acceptable uses within primary and secondary frontages provided that they present an active street frontage.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

We welcome this support.

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## Representation No: 590 / 3

Name : Mr Alun Evans

Organisation : Metropolitan Police Authority/Service (MPA/S)

Policy Policy DM13: Community and education space

Chapter:

Paragraph:

12.1.4

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### Reason for Objecting or Supporting?:

The supporting text of Policy DM11 sets out the Council's strategy for the protection of community and education uses. Paragraph 12.1.4 lists recognised community and education uses, including health centres, schools, cinemas and places of worship. The MPA/S note that there is no reference to policing facilities within this policy (or anywhere else in this document).

The MPA/S wish to highlight the need for increased policing facilities in the borough to ensure safe and secure communities are created. This reflects the national guidance of PPS1 which states (paragraph 27 (iii)) that development plans should promote safe and crime free communities.

It is essential that the Council ensures the emerging Development Management Policies document also reflects the strategic development plan, with regard to the definition of community infrastructure. Policing facilities are defined within Policies 3A.17 and 3A.18 of the adopted London Plan as a community facility and the emerging London Plan specifically includes 'Policing' within the Social Infrastructure definition. Furthermore, draft Policy 3.17 states that development proposals should support the provision of additional social infrastructure mindful of strategic and local need.

It is clear that the provision of appropriate policing facilities is supported at a strategic level and that therefore this should be reflected in the emerging Development Management Policies document – as required by PPS12. In order to ensure the emerging document can be judged 'sound' it is thus recommended that policing is included as a community use within Policy DM11, as set out below, in order to ensure existing and future residents and visitors have access to adequate policing facilities.

Acting on behalf of the MPA/S, CgMs have also made representations towards Barnet's Core Strategy Proposed Submission document Policy CS10. The letter includes the recommendation that policing facilities be included within the list of community facilities and includes a detailed policy justification for this.

he MPA/S therefore recommended that supporting paragraph 12.1.4 of Policy DM11 is amended to read (additional wording underlined):

Community and education uses include Class D1 (Non-residential institutions) D2 uses (Assembly and Leisure) - e.g. health centres, dentists, schools & further education, spaces for the arts, museums, libraries, community halls and other public meeting venues, theatres, cinemas, policing facilities, indoor and outdoor sports facilities and places of worship.

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### If you are Objecting, what changes are you seeking?:

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#### Council's response :

The supporting text has been amended to identify some Policing facilities as community uses

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**Representation No: 590 / 4**

**Name :** Mr Alun Evans

**Organisation :** Metropolitan Police Authority/Service (MPA/S)

**Policy** Policy DM13: Community and education space

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Policy DM11 states that the loss of any community/educational facility or use will only be acceptable in exceptional circumstances where new facilities of at least the equivalent quality or quantity are provided on the site or at an alternative location more accessible to users; or improvements are made to such facilities at other sites; or there is an excess of such facilities in the area.

The MPA/S support this policy as it is consistent with national and strategic guidance which states that the net loss of community facilities must be resisted.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

We welcome this support

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**Representation No: 590 / 5**

**Name :** Mr Alun Evans

**Organisation :** Metropolitan Police Authority/Service (MPA/S)

**Policy** Policy DM14: New and existing employment space

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

This policy seeks to protect Employment spaces in the borough 'where viable'.

The MPA/S have identified the potential of employment sites in helping to deliver their operational objectives by providing strategic custody and patrol facilities on a Borough or Sub-Regional basis, or to provide Pan-London facilities, where appropriate. The nature of these uses are similar to that carried out on most employment sites and therefore are ideally suited to employment sites and similarly designated locations.

This approach is supported by Policy 3B.4 of the London Plan which in dealing with Industrial Locations states that policies in DPDs "should develop local policies and criteria to manage industrial sites having regard to helping meet strategic and local requirements for... social infrastructure." Furthermore, emerging Policy 2.17 of the draft London Plan which deals with Strategic industrial locations defines inter alia 'other industrial related activities' as being acceptable within Preferred Industrial Locations. It is clearly demonstrated above that particular policing uses are essentially industrial and that the Development Management Policies document should therefore reflect this.

It is also further demonstrated that certain policing uses will also fulfil the strategic requirement regarding the provision of social infrastructure. Policy CS8 of CgMs' representation letter submitted as part of the Core Strategy consultation provides a detailed policy justification for the provision of policing facilities on employment sites. .

Mindful of the above and in order to comply with strategic policy in this regard, reference should be made after the third paragraph of Policy DM12 to the provision of social infrastructure, including policing, as appropriate alternative uses on employment land.

The MPA/S therefore recommend that Policy DM12 should be expanded as follows (additional wording underlined):

... a suitable period of active marketing has been undertaken.

Where appropriate employment sites may also accommodate alternative employment-generating uses, including community uses.

Loss of office sites in town centres.....

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

As set out under DM13: Community, health and education uses some Policing facilities are community uses. Not all community uses are suitable uses for industrial estates therefore it would not be appropriate to include a reference in the policy. The industrial estates are intended to be protected to ensure a pool of locally significant industrial land is retained in the borough for businesses. Certain policing facilities such as a vehicle depot may be able to demonstrate their appropriateness as part of the planning application process when considering an industrial estate site.

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**Representation No: 590 / 6**

**Name :** Mr Alun Evans

**Organisation :** Metropolitan Police Authority/Service (MPA/S)

**Policy** Policy DM17: Travel impact and parking standards

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

This Policy seeks to apply the London Plan parking standards to all planning applications (excluding residential developments for which specific standards are set out). However, the MPA/S recommend that reference should be made within this policy to specialised land uses, where the parking requirement should be assessed on an individual basis. The policy should therefore be expanded to include reference to meeting operational need. This is supported by the schedule of early suggested textual changes to the draft London Plan (published in May 2010) which seeks to ensure that the provision for parking at ambulance, fire and policing facilities will be assessed on their own merit.

The MPA/S recommend that the third paragraph of Policy DM14 be expanded to include (additional wording underlined):

Car parking provision should not exceed these standards. However, The parking requirements for specialised land uses, such as ambulance, fire and policing facilities will be assessed on an individual basis, having regard to the operational need of a particular use.

Parking proposals that detrimentally affect highway safety or residential amenity will be refused.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

Suggested wording has been adapted and included in the policy and supporting text to identify the special operational needs of the emergency services.

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**Representation No: 591 / 2**

**Name :** Mr Derek Epstein

**Organisation :** The Barnet Society

**Policy** Policy DM01: Protecting Barnet's character and amenity

**Chapter:**

**Paragraph:** 2.6.2

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**Reason for Objecting or Supporting?:**

Add to DM01

"Proactive steps will be taken to prevent further deterioration in the built environment by designating streets of attractive and harmonious houses as areas of special character and protecting them by ascribing conservation area status and/or the issue of Article 4 directions."

The Characterisation Study will have revealed many suburban streets which originally enjoyed a harmonious uniform character where the appearance has been spoiled by inappropriate alterations to some houses such as (poorly designed) plastic windows and (poorly designed) hardstandings - whether carried out with planning permission or under GPDO rights. It will also have identified some streets which have so far escaped this fate and which would be damaged if they were similarly treated.

---

**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

National policy does not require special character areas to be defined. The Core Strategy makes it clear how we are going to take forward the typologies identified in the Characterisation Study. We do not intend to introduce special character areas.

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**Representation No: 591 / 3**

**Name :** Mr Derek Epstein

**Organisation :** The Barnet Society

**Policy** Policy DM02: Development standards

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

6th paragraph of DM02 should be changed to read “All dwellings must be developed to meet or preferably exceed the minimum space standards set out in the draft revised London Plan. Developments providing homes below the minimum standards will be permitted only in exceptional circumstances.”

6th para states that “all dwellings should meet the minimum space standards with exceptions considered on a case by case basis”. Minimum space standards are intended to be a minimum. Therefore inferior standards should not be tolerated. There is also a widespread public opinion that room sizes in new developments are too small for practical living – e.g. double bedrooms into which one cannot fit a sensible amount of wardrobes. The objective should therefore be to exceed the minimum space standards, not merely to meet them.

---

**If you are Objecting, what changes are you seeking?:**

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**Council’s response :**

Development proposals will be expected to demonstrate compliance. Policy wording throughout the document which stated ‘should meet’ in the preferred approach has been changed to ‘will meet’ for the submission draft.

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**Representation No: 591 / 4**

**Name :** Mr Derek Epstein

**Organisation :** The Barnet Society

**Policy** Policy DM03: Accessibility and inclusive design

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Amend fifth bullet.

The fifth bullet says “all buildings” should be accessible by people with disabilities. Should that say “all public buildings”?

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**If you are Objecting, what changes are you seeking?:**

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**Council’s response :**

The supporting text has been amended to clarify that it refers to all buildings which are accessible to the general public such as shops and community facilities.

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**Representation No: 591 / 5**

**Name :** Mr Derek Epstein

**Organisation :** The Barnet Society

**Policy** Policy DM02: Development standards

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Play space: end of the first sentence should read "existing nearby facilities".

The point of this provision is surely to provide play space that occupants of the development can use

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The supporting text has been expanded to clarify that the nearest appropriate play area should receive S106 contributions for improvements.

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**Representation No: 591 / 6**

**Name :** Mr Derek Epstein

**Organisation :** The Barnet Society

**Policy** Policy DM02: Development standards

**Chapter:**

**Paragraph:**

3.4.3

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**Reason for Objecting or Supporting?:**

If this is a published standard, the name should be capitalised.

A definition of the term should be included.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

Agreed and amended

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**Representation No: 591 / 7**

**Name :** Mr Derek Epstein

**Organisation :** The Barnet Society

**Policy** Policy DM04: Environmental considerations for development

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Notifiable Installation should be defined

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The reason for designating a notifiable installation has been explained in the supporting text.

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**Representation No: 591 / 8**

**Name :** Mr Derek Epstein

**Organisation :** The Barnet Society

**Policy** Policy DM04: Environmental considerations for development

**Chapter:**

**Paragraph:** 5.5.3

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**Reason for Objecting or Supporting?:**

Remove the first bullet.

The poor condition of an existing heritage building should not (save in the most exceptional circumstances) be an excuse for destroying it.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

An additional paragraph has been added to clarify that all three points need to be demonstrated before a proposal can consider demolition.

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**Representation No: 591 / 9**

**Name :** Mr Derek Epstein

**Organisation :** The Barnet Society

**Policy** Policy DM06: Barnet's heritage and conservation

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Add "and areas of special interest".

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The Core Strategy makes it clear how we are going to take forward the typologies identified in the Characterisation Study. We do not intend to introduce special character areas.

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**Representation No: 591 / 10**

**Name :** Mr Derek Epstein

**Organisation :** The Barnet Society

**Policy** Policy DM06: Barnet's heritage and conservation

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Add "Consideration will be given to 'joining up' conservation areas when there is evidence that the character of existing conservation areas is damaged by inappropriate development in intervening locations."

Add "The Council will ensure that an active enforcement programme is pursued in conservation areas."

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The policy and supporting text set out that inappropriate development nearby will not be granted permission to ensure that the character or appearance of the conservation area is not harmed. Opportunities to amend the boundaries of conservation areas will be considered as part of Barnet's rolling programme of conservation area character appraisals.

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**Representation No: 591 / 11**

**Name :** Mr Derek Epstein

**Organisation :** The Barnet Society

**Policy** Policy DM07: Protecting housing in Barnet

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Change “will not be granted” to “will not normally be granted”

“will not be granted” is too dogmatic. There may be exceptions such as where a residential area without a convenient late-night corner shop would love to have one.

---

**If you are Objecting, what changes are you seeking?:**

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**Council’s response :**

The principle is to prevent the loss of housing. Local facilities are intended to be permitted but a corner shop is not identified as one such facility.

---

**Representation No: 591 / 12**

**Name :** Mr Derek Epstein

**Organisation :** The Barnet Society

**Policy** Policy DM08: Ensuring a variety of sizes of new homes to meet housing need

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Add “3- and 4-bedroom homes should be mainly houses with gardens”

Because 3- and 4-bedroom homes are mainly for families with children; and families with children need gardens, not communal play spaces several storeys below.

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**If you are Objecting, what changes are you seeking?:**

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**Council’s response :**

Further detail on the provision of outdoor amenity space - private gardens will be set out in the Sustainable Design and Construction SPD. Exceptions will be allowed in town centre and/or high density development as it is not always possible to deliver garden space in these schemes.

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**Representation No: 591 / 13**

**Name :** Mr Derek Epstein

**Organisation :** The Barnet Society

**Policy** Policy DM10: Affordable housing contributions

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Change "more flexible" to "flexible".

Make the first paragraph of DM08 more specific as to the objectives and nature of the "flexible policy".

"more" than what? (This is a policy document, not a report on differences between the LDF and the UDP.)

DM08 should state that the objective is for residential developments of 10-15 units to contain 30% affordable housing but that each case will be considered on its merits having regard to viability. i.e. embody into the DM Policy statement the thinking expressed in 9.5.1

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The policy has been reordered to make it clear that the more flexible approach applies to schemes between 15 and 10 units. This more flexible approach is subject to demonstrating issues with viability. The policy background sets out the reasoning for this increased flexibility which is aimed at delivering more small to medium size schemes.

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**Representation No: 591 / 14**

**Name :** Mr Derek Epstein

**Organisation :** The Barnet Society

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

In DM09 and a new preamble paragraph should be added.

Include a policy to preserve and enhance existing stall markets and ensure that upon redevelopment of market sites and/or adjoining sites, markets are fully integrated into the retail 'fabric' in terms of visibility, pedestrian flows etc.

To implement the policy described in para. 11.15.1 of Core Strategy and stated in the last bullet of CS6

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The Core Strategy policy CS6 seeks to protect existing markets. Markets are suitable town centre uses and can help to contribute to the vitality and viability of the town centres they are found in. The Town Centre Frameworks are the appropriate documents to contain detail on markets.

---

**Representation No: 591 / 15**

**Name :** Mr Derek Epstein

**Organisation :** The Barnet Society

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:** 10.8.1

---

**Reason for Objecting or Supporting?:**

10.8.1 and Table 7 need to be clarified

Add to the end of the last sentence "when formulating the Town Centre Frameworks."

We believe the 75% to be too low (if is intended to mean that, in a prime retail area, 25% of the frontages can be "dead" during the daytime.)

---

**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The review of the town centre frontages has demonstrated that the existing approach which identifies a 75% threshold for A1 use in the primary retail frontage as a suitable target to be maintained across Barnet. It is necessary to retain flexibility for other uses provide a balanced town centre. The 25% non A1 units are not usually 'dead' frontage containing uses that people generally expect to find in a town centre such as financial services (A2) and restaurants and cafes (A3).

---

**Representation No: 591 / 16**

**Name :** Mr Derek Epstein

**Organisation :** The Barnet Society

**Policy** Policy DM15: Green Belt and open spaces

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

1. Expand on the concept of "openness".
  2. The last sentence of the Green Belt/MOL paragraph should begin "Developments within and adjacent to...."
- 
- 1.The policy need to be clear as to what is meant by "openness". Does this mean not built upon? Not enclosed? Accessible by the public?
  - 2.For avoidance of doubt. (Development within the Green Belt/MOL should also not have a detrimental impact on visual amenity.)
- 

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The Green Belt policy has been expanded significantly and the supporting text clarifies the purpose of green belt land which is to prevent urban sprawl and keep land permanently open.

With regard to visual amenity the policy/supporting text has been expanded to include reference to appearance in relation to character and the impact of development adjacent to green belt.

---

**Representation No: 591 / 17**

**Name :** Mr Derek Epstein

**Organisation :** The Barnet Society

**Policy** Policy DM15: Green Belt and open spaces

**Chapter:**

**Paragraph:**

14.7.4

---

**Reason for Objecting or Supporting?:**

This as example of the effects of too much "flexibility".  
(See our comment on para 1.2.3)

It says:

- Avoid damage to conservation value of the site.
  - If you can't, then minimise it.
  - If you can only minimise it, mitigate the remainder.
  - If you can't mitigate it, pay compensation. (To whom? To the bats? How will the money be spent?)
- 

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The approach set out is in line with the London Plan. There are many areas of differing nature conservation value in Barnet and compensation could fund replacement habitat elsewhere or improvements in access. Harm is noted to be only permissible in exceptional circumstances.

---

**Representation No: 591 / 17**

**Name :** Mr Derek Epstein

**Organisation :** The Barnet Society

**Policy** Policy DM18: Telecommunications

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

In the first sentence, insert after "telecommunication equipment": "including mobile phone masts, and telephone equipment cabinets"

In the first bullet Insert after "building on which": "or space in which"

To cover equipment in the public realm such as mobile phone masts and boxes and CCTV camera poles.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Defining what constitutes telecommunications equipment may exclude some future type of equipment.

'or space in which' is a suitable addition.

---

**Representation No: 592 / 1**

**Name :** Mr Glen Rollings

**Organisation :** GLA

**Policy** Policy DM01: Protecting Barnet's character and amenity

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The policy seeks to ensure that proposals are assessed on the basis of their merit, that the character of Barnet suburbs is protected, and that the local supply of family homes is optimised according to need.

Although it is recognised that more detailed information on the assessment of development proposals would be included within the Residential Design SPD, there is currently ambiguity within the draft document as to how strictly the assessment criteria would be applied. It is important to ensure that development is enabled, rather than restricted and overly controlled, and as such there should be more information available to provide parameters and flexibility in development management assessment. Alternative tools to manage development over multiple sites should be acknowledged, such as local development orders, conservation areas and article 4 directions.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The policy has been redrafted. Paragraph 2.3.9 has been inserted to make it clear that whilst the policy is intended to protect it should not be used to restrict well designed and sympathetic development.

---

**Representation No: 592 / 2**

**Name :** Mr Glen Rollings

**Organisation :** GLA

**Policy** Policy DM03: Accessibility and inclusive design

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Policy DM02 addresses design considerations for developments. The Council should consider better integrating the need for inclusive access with this policy. It may also be useful to reference a commitment to the provision of lifetime neighbourhoods and how the principles of lifetime neighbourhoods will be applied in Barnet.

The policy should recognise that even in areas that are not deficient in children and young people's outdoor play facilities, new development as well as still being required to provide a financial contribution towards existing facilities may also be required to provide on site provision for small children who need direct access to play spaces i.e. under 5 year within 100m, 5-11 year olds within 400 m.

Accessible public transport plays an important role in providing access to opportunities, goods and services. Furthermore providing accessible walking routes as part of the public transport network is essential, in particular for those who may not have the ability to readily use other modes of public or private transport.

A reference to the Department for Transport Inclusive Mobility (December 2005) standards should be included in the DMP in relation to the pedestrian environment. It should be noted that all footways need to be a minimum of 2 metres wide to meet these standards, unless physical constraints render this not possible.

The Council may also wish to consider the need for shared space within new developments. Shared space provides tangible benefits, for example, via the utilisation of colour and tactile information to communicate shared space to vulnerable users. The Council will be aware how important it is to address the issues around shared space schemes and put appropriate guidance in place, in particular for disabled and older people, especially blind and partially sighted people, guide dog users and wheelchair users.

Transport for London recommends that a reference should be made to making bus stops throughout the borough accessible in line with TfL's bus stop accessibility guidance, Bus Priority Team technical advice note BP1/06 (January 2006). In order to achieve greater bus stop accessibility, and more generally, the Borough should utilise developer funding through s106 agreements. The inclusion of the above reference would support London Plan Policy 3C.20 'Improving conditions for buses', and London Plan: consultation draft replacement (October 2009) Policy 6.7 'Buses, bus transits, trams'.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

New policy DM03: Accessibility and Inclusive Design has been added which references lifetime neighbourhoods, inclusive mobility and wider pedestrian environment.

Reference to developments contribution in areas not deficient in play space has been added.

Improving public transport accessibility is dealt with in CS9 and it is also referenced in DM17: Travel Impact and parking standards. Bus stops have been referenced as an example of where S106 monies could be used to improve transport in the borough.

---

**Representation No: 592 / 3**

**Name :** Mr Glen Rollings

**Organisation :** GLA

**Policy** Policy DM06: Barnet's heritage and conservation

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The policy mainly focuses on the conservation of particular heritage assets. It should also recognise the importance role of heritage led regeneration in developing and enhancing an area and set out principles in how this will be managed.

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**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Further reference to the importance of the historic environment has been added to policy DM06 to highlight the value of heritage assets in line with PPS5; this includes reference to regeneration. The policy makes clearer the need to comply with PPS5 and the protection of heritage assets in line with their significance.

---

**Representation No: 592 / 4**

**Name :** Mr Glen Rollings

**Organisation :** GLA

**Policy** Policy DM07: Protecting housing in Barnet

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Although the policy presumes against loss of housing, the Council may wish to be more specific with regard to the types of replacement community use, or provide more guidance (through the accompanying text or an SPD) regarding potential uses and thresholds, and potentially a list of identified area needs and deficiencies of such uses. As it stands, the policy does not comply with London Plan policies regarding loss of housing.

While it is understood that such community uses can have a wider benefit, there are often related problems such as additional traffic and neighbour disturbance. Additionally, given the Council's strong desire to retain family housing, larger houses should be excluded from conversion.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The policy has been clarified to only permit loss of residential where a clear local need can be demonstrated, the policy approach for the location of new community facilities is met and residential amenity is not impacted. The use has been limited to either a GP premises, nursery or educational use.

---

**Representation No: 592 / 5**

**Name :** Mr Glen Rollings

**Organisation :** GLA

**Policy** Policy DM08: Ensuring a variety of sizes of new homes to meet housing need

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

The policy does not provide figures for achieving a housing mix, only priorities. A rejected option states that provision of figures or targets would be “prescriptive and less flexible to deliver a site”. However, provision of family housing is both a strategic and a local priority. A borough-wide target would therefore be appropriate, with provision for flexibility in certain cases. Provision of a robust target would assist the Council in its negotiations with applicants and contribute to strategic needs.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council’s response :**

DM06 is in line with the Core Strategy which includes the objective to provide housing choice to meet the aspirations of existing and future residents. In line with guidance set out in PPS3 the North London Strategic Housing Market Assessment helps determine the dwelling mix for new residential schemes.

---

**Representation No: 592 / 6**

**Name :** Mr Glen Rollings

**Organisation :** GLA

**Policy** Policy DM03: Accessibility and inclusive design

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The draft policy is appropriate, but should recognise that such housing may have particular access requirements.

---

**If you are Objecting, what changes are you seeking?:**

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**Council’s response :**

The new policy DM03: Accessibility and Inclusive Design will cover this.

---

**Representation No: 592 / 7**

**Name :** Mr Glen Rollings

**Organisation :** GLA

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Although the policy acknowledges that a mix of uses represents sustainable growth, it should note the role of town centres as main locations for employment growth. Although this theme is referenced within policy DM12, a reference in DM09 would be appropriate.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The supporting text has been expanded to recognise that viable employment space must be retained and growth enabled as part of mixed use development in town centres.

---

**Representation No: 592 / 8**

**Name :** Mr Glen Rollings

**Organisation :** GLA

**Policy** Policy DM15: Green Belt and open spaces

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The quote: "Development adjacent to Green Belt/MOL should not have a detrimental impact on visual amenity," should also include a reference to the protection of the character of these areas.

Although the policy seeks to protect all types of open space, there should be no loss of playing fields or other types of sporting/recreational space, as the loss of such spaces is particularly acute in London.

The requirement to provide acceptable play facilities for children of all ages in both new and renewed open space should be included within the policy. The accompanying text should note that larger developments may need to provide a higher level of play space than the overall figure provided (0.09ha per 1,000 residents), in accordance with the Mayor's Providing for Children and Young People's Play and Informal Recreation SPG, and/or suitable local guidance.

The objectives of the Mayor's Blue Ribbon Network policies should be acknowledged for its role in providing environments for both recreation and biodiversity.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

A reference to character of green belt and adjacent areas has been added.

The open spaces protected by the policy have been defined and include outdoor sports making specific reference to playing fields.

Reference to a higher standard for larger developments for childrens playspace has been added.

Reference to the Blue Ribbon network policies has been added under DM04: Environmental Consideratrions under a new section entitled watercourse restoration.

---

**Representation No: 592 / 9**

**Name :** Mr Glen Rollings

**Organisation :** GLA

**Policy** Policy DM17: Travel impact and parking standards

**Chapter:**

**Paragraph:**

15.4

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**Reason for Objecting or Supporting?:**

Section 15.4 of the Borough's DMP sets out Barnet's preferred approach in terms of transport. Transport for London (TfL) considers that this section should include commentary about working with developers to secure s106 funding for bus service changes and new bus infrastructure as required, to mitigate the impact of developments.

TfL suggests the overall policy on planning obligations should include explicit support for pooled contributions, as advocated in circular 05/05 and Community Infrastructure Regulations (CIL) 2010. TfL suggests that the following wording is incorporated:

"Contributions will be sought for transport infrastructure and service improvements to ensure that efficiency and capacity on the transport network is maintained and that the impact of the development on the transport network is mitigated. In circumstances where the combined impact of a number of developments creates the need for the provision of additional transport infrastructure and or services, it will be appropriate to pool the contributions from these developments. The level of contribution, whether pooled from a number of developments or not, may be based on a formula or standard charge which reflects the actual impact of the development."

It is appropriate to seek contributions that contribute to borough wide transport improvements, as well as site-specific improvements. The list of identified transport improvements should be worked up in consultation with TfL.

A clear distinction should be made between the community infrastructure levy (CIL) and legally binding planning obligation to avoid limiting the scope for funds, this is particularly important to Bus Network contributions which at present are not considered as infrastructure under the CIL.

---

**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

Reference to using S106 agreements where appropriate to improve public transport has been added. Reference to pooling contributions is set out in the introduction under a new heading for implementation.

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## Representation No: 592 / 10

Name : Mr Glen Rollings

Organisation : GLA

Policy Policy DM17: Travel impact and parking standards

Chapter:

Paragraph:

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### Reason for Objecting or Supporting?:

The parking standards set out in Policy DM14 are not in line with the London Plan. TfL urges the Borough to implement maximum parking standards in line with those set out in the London Plan.

This is currently an issue of non-conformity with the London Plan.

Policy DM14 sets out that development which proposes limited or no parking where a proposal is within a Controlled Parking Zone. TfL do not consider that a Controlled Parking Zone or excellent public transport should be predetermining factors as to whether a development can be car free or have limited car parking. It should be for the developer to assess the needs of the development, should the developer wish to propose car free development they should not be restricted by onerous policy controls. The effects of car free development can be mitigated such as restricting new residents from obtaining parking permits through conditions or planning obligations.

Government and London Plan policy encourages boroughs to promote a pattern of development that reduces the need to travel, especially by car. In Barnet, this could be achieved by adopting maximum car parking standards, car free housing developments and encouraging the use of car pooling/car clubs.

Electric vehicle charging is currently dealt with through Policy CS9: Providing effective and efficient travel. In TfL's view this should be addressed in Policy DM14: Parking standards and travel impact.

---

### If you are Objecting, what changes are you seeking?:

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#### Council's response :

The policy sets out the parking standards for new development which will ensure appropriate parking provision for Outer London. This is on the basis that Outer London has different needs to Inner or Central London. These standards will closely reflect the existing UDP standards of 1.33:1 parking spaces for new residential development and 2 for family homes. Further evidence will be provided to the Mayor's office to support this policy.

The car free aspect of the policy has been revised to require developers to demonstrate through a survey that there is sufficient on street parking capacity to meet the demand from the development. High PTAL and the presence of a Controlled Parking Zone are no longer policy requirements.

---

**Representation No: 593 / 1**

**Name :** Mr Derrick Chung

**Organisation :** WHRA & FYP

**Policy** Policy DM15: Green Belt and open spaces

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The DM policies protecting environments /green belts should include areas such as York Park with its well established trees and in particular The Welsh Harp a SSSI wildlife habitat nature conservation area.

---

**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The policy aims to protect existing open spaces, including public open spaces, sports fields and allotments as well as areas of biodiversity importance such as the Welsh Harp.

---

**Representation No: 593 / 2**

**Name :** Mr Derrick Chung

**Organisation :** WHRA & FYP

**Policy** Policy DM01: Protecting Barnet's character and amenity

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

High Rise tower blocks, high density, overdevelopment, over populating, out of character developments etc, would be reintroducing the social dilemmas such as drug and alcoholic abuse, various crimes, and poverty associated with such areas and is passed on by generations since the 1970's.

---

**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

High density development can deliver contemporary design solutions will be expected to create new urban forms of places and buildings that significantly raise the standards of urban design and environmental performance of buildings. The policy has been redrafted to set out the standards for development required in Barnet.

---

**Representation No: 593 / 3**

**Name :** Mr Derrick Chung

**Organisation :** WHRA & FYP

**Policy** Policy DM08: Ensuring a variety of sizes of new homes to meet housing need

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

Communities and its citizens needs should be the priority in providing 1/2/3/4 beds homes as needs required to meet design, space and build standards, within a reliable/sustainable infrastructure, and not just cater to developers programmes that is profit driven.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

DM06 is in line with the Core Strategy which includes the objective to provide housing choice to meet the aspirations of existing and future residents. In line with guidance set out in PPS3 the North London Strategic Housing Market Assessment helps determine the dwelling mix for new residential schemes.

---

**Representation No: 593 / 4**

**Name :** Mr Derrick Chung

**Organisation :** WHRA & FYP

**Policy** Policy DM07: Protecting housing in Barnet

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Protecting housing within the borough is possible if the existing homes are repaired to the levels that meets the Decent Homes standard by replacing/repairing, bathrooms, toilets, kitchens, windows, communal areas, drains etc, and any additional repairs needed.

---

**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The loss of all housing to other uses will not generally be acceptable. Demolition and net replacement of housing will be acceptable which in line with DM02: Development Standards will improve the housing stock.

---

**Representation No: 593 / 5**

**Name :** Mr Derrick Chung

**Organisation :** WHRA & FYP

**Policy** Policy DM10: Affordable housing contributions

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

A clear and precise definition of the term "Affordable" is needed and whether it applies to tenants or landlords.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

Affordable housing is defined by PPS3: Housing. "Affordable housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market."

---

**Representation No: 593 / 6**

**Name :** Mr Derrick Chung

**Organisation :** WHRA & FYP

**Policy** Policy DM09: Specialist housing

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Specialist -Multiple Homes- The elderly and disabled should not be made to feel isolated just because of their age and mobility, and more protection should be enforced to protect them from any type of ASB that they could be exposed to or is likely to affect them directly. Proper placements is important as is management.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

We want residents to live healthy and independent lives. The Core Strategy and DMP DPD have been produced to support this objective. National research reveals that the majority of older people would prefer to either remain living in their home, or would prefer accommodation which is part of the ordinary housing stock but is designed to meet their needs. Therefore adapting the existing housing stock to extend the housing choice for older people will be encouraged.

---

**Representation No: 593 / 7**

**Name :** Mr Derrick Chung

**Organisation :** WHRA & FYP

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

DM9/10/11-Town centres should be a vibrant and lively areas of multiple attractive outlets that will attract people to, other than one major trade outlet that is likely to stifle smaller businesses and create high streets of derelict properties

---

**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The policy aims to maintain the vitality and viability of a town centre through ensuring appropriate town centre uses are located in the town centres, managing changes to existing shops and delivering mixed use development.

---

**Representation No: 593 / 9**

**Name :** Mr Derrick Chung

**Organisation :** WHRA & FYP

**Policy** Policy DM13: Community and education space

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Communities should be able to access facilities such as (Affordable) leisure centres, libraries, doctors, dentists, ante- natal clinics, toddler nurseries, school places, and any other that would contribute to education and training for types of employment later on.

---

**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The policy plans to protect existing community and education uses in a range of locations across the borough, and ensure that new facilities are in accessible locations, primarily the town centres/local centres.

---

**Representation No: 594 / 1**

**Name :** Jan Charman

**Organisation :** NHS Barnet

**Policy** Policy DM01: Protecting Barnet's character and residential amenity

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The policy refers to protecting amenity and quality of life. We suggest that it should recognise the links to health, particularly mental health and wellbeing caused by intrusive and unsympathetic development. In particular, light pollution can have a negative impact.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Reference has been added to the introductory paragraphs to policy DM02: Development Standards to mental health and the impact of development on quality of life.

---

**Representation No: 594 / 2**

**Name :** Jan Charman

**Organisation :** NHS Barnet

**Policy** Policy DM02: Development standards

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

We suggest that the policy should recognise that good design will have a positive effect on health, for example by providing amenity and play spaces, applying internal space standards, controlling noise transference within and between buildings and reducing the fear of crime.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Reference has been added throughout where appropriate to recognise the positive effect on health.

---

**Representation No: 594 / 3**

**Name :** Jan Charman

**Organisation :** NHS Barnet

**Policy** Policy DM04: Environmental considerations for development

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

To reflect London Plan Policy 3A.23 Health impacts (and the draft replacement Policy 3.2 Improving health and addressing health inequalities), the document should set out a requirement for health impact assessment (HIA) of major developments. Many of the environmental considerations addressed in the policy will have an impact on health, notably pollution and flooding and to support the core strategy objective and policy to improve health and wellbeing we suggest that the policy addresses the health impacts of development. The role of HIA would be to recommend or support changes to a development or regeneration proposal to address the impacts on health, which would include healthcare services and the wider determinants of health. A HIA could be included within the EIA process.

---

**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

Policy DM02: Development Standards has been amended to include a reference to HIA.

---

**Representation No: 594 / 4**

**Name :** Jan Charman

**Organisation :** NHS Barnet

**Policy** Policy DM09: Specialist housing

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

The policy does not specifically address the trends and issues identified in the core strategy (paras 9.3.3. to 9.3.5) and to support Policy CS 4 it should seek to provide a range of housing options for older people.

---

**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

Reference to the Core Strategy has been made which including the need to address extra care housing.

---

**Representation No: 594 / 5**

**Name :** Jan Charman

**Organisation :** NHS Barnet

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Policy DM09 refers to resisting an over concentration of similar uses in town centres. Similarly, DM10 seeks to resist an over-concentration of A3-A5 uses or where a proposal affects the amenity of existing residents. Restricting new A5 takeaways either through changes of use or through new retail development could also help promote healthy eating in the borough.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

DM11: Development Principles for barnet's town centres contains the frontages policy which aims to control the amount of non retail use. In particular it refers to preventing a concentration of similar non retail uses which can include take aways.

---

**Representation No: 594 / 7**

**Name :** Jan Charman

**Organisation :** NHS Barnet

**Policy** Policy DM13: Community and education space

**Chapter:**

**Paragraph:** 12.1.9

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**Reason for Objecting or Supporting?:**

Paragraph 12.1.9 refers to the impact of new community facilities on the amenity of nearby residential properties. This should not inhibit extending the hours of GP surgeries to meet additional need for services.

---

**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

Impact on residential amenity will not exclude assessing the impact of extending the hours of a GP surgery if planning permission is required.

---

**Representation No: 594 / 8**

**Name :** Jan Charman

**Organisation :** NHS Barnet

**Policy** Policy DM13: Community and education space

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

We consider that when considering the loss or replacement of facilities, consideration should be given to the relevant service strategy, such as NHS Barnet's estate strategy. It should be recognised that in some instances, new facilities or improvements to existing facilities will need to be supported by improvements to public transport.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

NHS Barnet's estate strategy can be used to respond to the policy to help demonstrate how the communities needs will continue to be met. Reference to improving access such as public transport has been added as a consideration in the supporting text.

---

**Representation No: 594 / 9**

**Name :** Jan Charman

**Organisation :** NHS Barnet

**Policy** Policy DM15: Green Belt and open spaces

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

We consider that a requirement for new open space or improvements to the quality or accessibility of existing spaces, particularly in deficiency areas should be supported and justified by its contribution to healthy lifestyles. It could address the role of different types of spaces to provide relaxation, opportunities for child play and participation in formal sporting activity.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The policy sets out the standards that we expect to be met in areas of public open space deficiency. This sets out standards for four different types of space; parks, childrens playspace, sports pitches and natural green space.

---

**Representation No: 594 / 10**

**Name :** Jan Charman **Organisation :** NHS Barnet

**Policy** Policy DM17: Travel impact and parking standards **Chapter:** **Paragraph:**

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**Reason for Objecting or Supporting?:**

We suggest that the measures to address transport impacts and to reduce the demand for travel by car should recognise the health benefits, for example by improving road safety, reducing exposure to air pollution and promoting active travel.

---

**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The policy has been revised. It addresses road safety and increases reference to cycling and walking.

---

**Representation No: 595 / 1**

**Name :** Mr Graham Saunders **Organisation :** English Heritage

**Policy** Introduction **Chapter:** **Paragraph:** 1.3.5

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**Reason for Objecting or Supporting?:**

The Borough's Tall Buildings Study should be referenced in this paragraph.

The Study has been used as evidence base to inform the LDF and should as a result inform the Development Management Policies.

We would also point out that the lack of a policy for the management of tall buildings presents a threat to the sustainable development of the borough, as defined in PPS 1 paragraph 19. The additions which we have proposed for the Development Management Policies Document in relation to tall buildings could be registered as a sustainability issue within the Sustainability Appraisal to provide additional justification for these changes.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Reference to the tall buildings study has been added to the list of evidence identified in the introduction.

---

**Representation No: 595 / 2**

**Name :** Mr Graham Saunders

**Organisation :** English Heritage

**Policy** Policy DM01: Protecting Barnet's character and amenity

**Chapter:**

**Paragraph:** 2.4.1

---

**Reason for Objecting or Supporting?:**

We would question whether the loss of existing vegetation is the greatest threat to Barnet's local character. We would suggest that this conclusion does not take account of the piecemeal erosion of the Borough's local built and historic character as a result of inappropriate developments (e.g. through poor design, use of materials, contextually inappropriate scale or buildings heights, including tall buildings). There are a number of threats to Barnet's local character which development management can help address, for example development pressure (in the short-medium term) or climate change (long-term). We therefore suggest that this paragraph is reworded to provide a more balanced and comprehensive understanding of the multiple threats to Barnet's local character, including those noted above.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The supporting text has been revised to acknowledge all the threats to Barnet's local character.

---

**Representation No: 595 / 3**

**Name :** Mr Graham Saunders

**Organisation :** English Heritage

**Policy** Policy DM01: Protecting Barnet's character and amenity

**Chapter:**

**Paragraph:** 2.5.1

---

**Reason for Objecting or Supporting?:**

This paragraph does not take into account Barnet's town centres where there is an equally important threat to historic character. Town centres typically face the greatest development pressure due to their high levels of accessibility, but they also tend to have the highest concentrations of heritage assets. Therefore it is even more important that development is carefully managed to protect and enhance the local character of town centres.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The supporting text has been revised to make clear the historic importance of the town centres referencing Finchley Church End, Chipping Barnet and Golders Green.

---

**Representation No: 595 / 4**

**Name :** Mr Graham Saunders

**Organisation :** English Heritage

**Policy** Policy DM01: Protecting Barnet's character and amenity

**Chapter:**

**Paragraph:**

2.5.3

---

**Reason for Objecting or Supporting?:**

We welcome the intention to produce Residential Design Guidance and Green Infrastructure SPDs, and we look forward to reviewing these documents in due course. In addition, we would suggest that Barnet's Characterisation Study is referenced. As suggested the Study provides seeks to define the local character and provides evidence against which proposals can be assessed for appropriateness.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Reference to the characterisation study has been added and its importance in informing decisions on proposals.

---

**Representation No: 595 / 6**

**Name :** Mr Graham Saunders

**Organisation :** English Heritage

**Policy** Policy DM01: Protecting Barnet's character and amenity

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

Bullet point 4: The policy wording should be amended to the following to reflect the historic environment and its influence upon new developments; Relationship with the established local character and historic environment.

We suggest that an explicit reference be made to the Characterisation Study, requiring that applicants demonstrate in their design and access statements how their proposals have been informed by an understanding of the local character, as defined in the study.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The policy has been redrafted. It is suggested that local character is the historic environment where appropriate so a specific reference is not been included.

Reference to the characterisation study has been added and its importance in informing decisions on proposals.

---

**Representation No: 595 / 7**

**Name :** Mr Graham Saunders

**Organisation :** English Heritage

**Policy** Policy DM01: Protecting Barnet's character and amenity

**Chapter:**

**Paragraph:** 3.1.2 table 1

---

**Reason for Objecting or Supporting?:**

Within the national and regional policy review, greater emphasis could be placed specifically on the requirement that all design proposals should be clearly rooted in local and historic character. For example, PPS1 paragraph 17 states that “Planning policies should seek to protect and enhance the quality, character and amenity value of the countryside and urban areas as a whole”. PPS5 HE3.1 requires that LDF’s take into account the “contribution made by the historic environment by virtue of...it’s influence on the character of the environment and an area’s sense of place”.

These policies help ensure that that historically sensitive contextual design lies at the heart of high quality developments. This point should be made clear at the start of this section.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council’s response :**

Reference to PPS1 has been added to a new guidance box inserted for policy DM01. Reference to the importance that that heritage plays in creating character has been included in the supporting text.

---

**Representation No: 595 / 8**

**Name :** Mr Graham Saunders

**Organisation :** English Heritage

**Policy** Policy DM05: Tall Buildings

**Chapter:**

**Paragraph:** 3.1.1 to 3.6.1

---

**Reason for Objecting or Supporting?:**

We are concerned that there is currently no reference within chapter 3 to tall buildings. To reflect EH/CABE Guidance we would advise that the Core Strategy provides a strategic framework in which tall buildings will be managed in terms of broadly identifying where they may be appropriate and inappropriate. This framework should then be supported by Development Management Policies that set out a criteria based approach to the assessment of tall buildings in specific locations that have been identified through the Core Strategy as being potentially appropriate.

We therefore suggest that a policy that sets out criteria for the assessment of tall building proposals should be provided in chapter 3. This new policy should be based upon the Criteria Evaluation set out in the EH/CABE Guidance on Tall Buildings. This provides a comprehensive list of issues based on a robust understanding of urban design issues including the historic environment and heritage assets.

In general consideration should be given to development management decisions involving sustainability infrastructure such as the installation of energy efficiency improvements and micro-generation technologies. This is an emerging issue for the historic environment and should be clearly addressed in this section.

English Heritage supports the provision of sustainability infrastructure for the public benefit where it addresses climate change and reduces nationwide resource consumption. We keen to ensure these measures are implemented so as to avoid harm to the historic environment as far as possible. PPS5 Policy HE1 requires that a balanced approach is taken towards development management which weighs up the loss of historic significance against climate change mitigation opportunities in terms of the public interest.

Greater consideration should be given to the need to protect the wider historic environment for its contribution to sense of place and potential to be a catalyst for regeneration (PPS5 policy HE 3.1). For example, in areas where there are few designated heritage assets it is still crucial that new development is integrated with its local and historic context in terms of character and appearance. Physical and visual integration promotes social and economic integration with a development's surroundings.

This point should be made in 5.5 Preferred approach, backed up with a reference to policy 3.1 in table 5.5, and an appropriate policy DM04 (see below).

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The DMPDPD now includes a new policy on tall buildings in line with the approach set out in the Core Strategy.

The policy will require tall buildings to demonstrate their relationship with the street, integration into the urban fabric, impact on local views and the skyline. Reference is made to the CABE/English Heritage guidance and the evidence provided in the Tall Buildings Study.

---

**Representation No: 595 / 9**

**Name :** Mr Graham Saunders

**Organisation :** English Heritage

**Policy** Policy DM01: Protecting Barnet's character and amenity

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Design considerations. Following earlier comments regarding the need for historically contextual design (table 1), we recommend that the first design consideration of policy DM02 include the following additional phrase:

All development in Barnet will be expected to demonstrate high quality design which makes a positive contribution to the borough and which relates to local and historic character and context.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

It is suggested that local character is the historic environment where appropriate so a specific reference is not been included.

---

**Representation No: 595 / 10**

**Name :** Mr Graham Saunders

**Organisation :** English Heritage

**Policy** Policy DM06: Barnet's heritage and conservation

**Chapter:**

**Paragraph:**

5.4.2

---

**Reason for Objecting or Supporting?:**

We welcome the intention to illustrate the Borough's rich historic environment by giving an overview of its heritage assets. For clarity it might be useful to list all of the Borough's asset types in a single paragraph, rather than splitting them between paragraphs 5.3.1, 5.4.1 and 5.4.2. For example, the current structure gives the sense that the Borough's evidence base on the historic environment does not include its designated battlefield, or the local designations contained in the UDP.

In addition, for completeness we suggest that any green spaces within Barnet which appear on the London Parks and Gardens Trust inventory of history green spaces should be included within the list of heritage assets.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

A new table has been added to list the boroughs heritage assets.

---

## Representation No: 595 / 11

Name : Mr Graham Saunders

Organisation : English Heritage

Policy Policy DM06: Barnet's heritage and conservation

Chapter:

Paragraph: 5.1.1 Table 3

---

### Reason for Objecting or Supporting?:

We welcome the review of historic environment policy provided here.

The review could be strengthened further through inclusion of the following elements:

1. Reference in the first paragraph to the need to consider the settings of all heritage assets as well as the assets themselves PPS5, policy HE6.1)
  2. Reference in the first paragraph to the need to record and disseminate the findings of any necessary archaeological excavation work.
  3. A reference to policy HE 3.1 which requires that Local Authorities take into account the contribution made by the wider historic environment to the local character and an area's sense of place.
  4. Description of the statutory legislation behind heritage protection (i.e.. Planning (Listed Buildings and Conservation Areas) Act 1990), which provides the context for the wording used in policy DM04.
  5. A reference to the approach to climate change issues set out in PPS5 policy HE1, as set out above.
- 

### If you are Objecting, what changes are you seeking?:

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#### Council's response :

References to HE6.1, HE3.1 and H1 have all been added to strengthen the review of historic environment policy. The section on archaeology has been expanded and reference added to HE12 added. Reference to the 1990 Act has been added.

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**Representation No: 595 / 12**

**Name :** Mr Graham Saunders

**Organisation :** English Heritage

**Policy** Policy DM06: Barnet's heritage and conservation

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Following on from comments made above, policy DM04 should be expanded to address the following in order for policy DM04 to comply with PPS5:

The policy lacks a headline section that captures all heritage assets and the principle of conserving and enhancing their significance including their setting. This should then be followed by the approach set out of providing more detailed policy direction in relation to particular heritage assets.

- The second paragraph should make reference to PPS5 Policies HE7-10.
  - Define more clearly other types of heritage assets such as Registered Parks and Gardens, Scheduled Monuments and Battlefield.
  - The need to avoid harm to the historic environment when installing climate-change and sustainable infrastructure (as set out in PPS5 policy HE1)
  - The need to have regard to local historic context when assessing proposals for new development (PPS5 policy HE 3.1)
  - The need to record and disseminate the results of any necessary archaeological investigation.
- 

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

A headline section has been added which sets out the principle of protecting in line with a heritage assets significance. Reference to policies HE7-10 have been added. The table of heritage assets has been expanded. Reference to responding to climate change and having regard to the local historic context has been added. The need to record any archaeological remains has been added.

---

**Representation No: 595 / 13**

**Name :** Mr Graham Saunders

**Organisation :** English Heritage

**Policy** Policy DM15: Green Belt and open spaces

**Chapter:**

**Paragraph:**

14.1.1.

---

**Reason for Objecting or Supporting?:**

The heritage value of open spaces and wider landscapes should be recognised within the open spaces and biodiversity section, which provides a more comprehensive understanding of their particular intrinsic qualities and their value to the community. This also provides an additional rationale for their protection. This reflects PPS5 advice.

---

**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The opening paragraph has been amended to reference the heritage value of open spaces to residents.

---

**Representation No: 595 / 14**

**Name :** Mr Graham Saunders

**Organisation :** English Heritage

**Policy** Policy DM15: Green Belt and open spaces

**Chapter:**

**Paragraph:**

14.6

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**Reason for Objecting or Supporting?:**

We suggest that a requirement is inserted to protect the historic significance of open spaces as well as their biodiversity value.

---

**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

Reference has been added to the historic significance of those parks and gardens identified by the London Parks Gardens Trust.

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**Representation No: 595 / 15**

**Name :** Mr Graham Saunders

**Organisation :** English Heritage

**Policy** Policy DM15: Green Belt and open spaces

**Chapter:**

**Paragraph:**

14.6

---

**Reason for Objecting or Supporting?:**

We suggest that a requirement is inserted to protect the historic significance of open spaces as well as their biodiversity value.

Following the above we suggest that a phrase is inserted to policy DM13 to require that proposals seek to protect the historic significance of open spaces.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Reference has not been added as a link has been made in the supporting text to the principle set out in DM06: Heritage and Conservation that all heritage should be protected in line with its significance.

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## Representation No: 596 / 1

Name : Mr Bob Papat

Organisation : Riverglade Estates Ltd.

Policy Policy DM11: Development principles for Barnet's town centres

Chapter:

Paragraph:

10.5

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### Reason for Objecting or Supporting?:

Section 10.5 Mixed Uses recognises that opportunities may exist through either regeneration or re-use of existing employment spaces to provide mixed use including new residential and community uses whilst continuing to provide employment space. Viable employment activity should be retained.

Policy DM09 refers to the town centre boundaries defined in Appendix 4. These show that the site is within the town centre boundary for Finchley Church End.

Under the heading of mixed use development the policy also states that unless otherwise indicated in the Site Allocation DPD or Town Centre the protection of employment floorspace should meet the requirements set out in DM09. Once these requirements are satisfied appropriate mixed use redevelopment will be expected to provide community uses and some re-provision of employment floorspace as well as residential. The policy contains no other specific guidance on the protection of existing office floorspace. Section 13 and Policy DM12 deal specifically with new and existing employment space.

Setting out the preferred approach paragraph 13.5.1 outlines specific questions which should be considered before allowing a change of use of employment land. These include whether the size of the building makes it suitable for small or medium enterprises and whether it is fit for purpose to meet modern day commercial requirements. Paragraph 13.5.2 explains that additionally a site may be redeveloped or reused if there is no interest in its use for offices after active marketing of 6-12 months.

Policy DM12 is not entirely consistent with this approach as it does not embrace the approach set out in paragraph 13.5.1. While it does seek to safeguard employment spaces capable of meeting modern needs it states that sites identified as Business Locations (the Regents Park Road employment cluster being such a site) will not be permitted to change from employment space.

Policy DM12 considers that the loss of office sites would be expected to provide appropriate mixed use re-development which provides community uses and some re-provision of employment floorspace as well as residential where appropriate.

We suggest that Policy DM12 is reworded so that it enables sites such as Gateway House to be considered for mixed use schemes where it can be demonstrated that such sites are no longer suitable or viable for continued office use (6 – 12 months marketing). This approach would be consistent with Policy EMP7 of the UDP.

With regard to Policies DM09 and DM12, the wording is such that a mixed use scheme should include community uses. Whilst mixed use schemes are supported, there is no justification for community uses ahead of, for example, residential. Such an approach could seriously jeopardise the viability of developments and as such the regeneration of town centres. Therefore we strongly suggest that a requirement for mixed use schemes to include community uses is removed from both policies.

In relation to Gateway House, a mixed use scheme is being pursued by my client which may or may not include community uses. This will largely depend on the viability of the scheme and the Council's approach to rents, etc.. Such an approach is consistent with Policy EMP 7 of the UDP and the draft Town Centre Planning Strategy for Finchley Church End (March 2010) which advises that potential exists to refurbish to provide a mix of uses which may include improved offices, residential units and new community and hotel uses at Gateway House (my emphasis).

---

### If you are Objecting, what changes are you seeking?:

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**Council's response :**

Policy has been amended to correctly cross refer to policy DM12 and include a reference to Locally Significant Industrial Sites and Business Locations as exceptions where the release of employment land for other uses will not be permitted. The supporting text for policy for Locally Significant Industrial Sites and Business Locations has been clarified as these locations are intended to protect against any change from business use in order to maintain strategic sites for employment in the borough.

---

**Representation No: 596 / 2**

**Name :** Mr Bob Popat

**Organisation :** Riverglade Estates Ltd.

**Policy** Policy DM14: New and existing employment space

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

Policy DM12 considers that the loss of office sites would be expected to provide appropriate mixed use re-development which provides community uses and some re-provision of employment floorspace as well as residential where appropriate.

We suggest that Policy DM12 is reworded so that it enables sites such as Gateway House to be considered for mixed use schemes where it can be demonstrated that such sites are no longer suitable or viable for continued office use (6 – 12 months marketing). This approach would be consistent with Policy EMP7 of the UDP.

With regard to Policies DM09 and DM12, the wording is such that a mixed use scheme should include community uses. Whilst mixed use schemes are supported, there is no justification for community uses ahead of, for example, residential. Such an approach could seriously jeopardise the viability of developments and as such the regeneration of town centres. Therefore we strongly suggest that a requirement for mixed use schemes to include community uses is removed from both policies.

In relation to Gateway House, a mixed use scheme is being pursued by my client which may or may not include community uses. This will largely depend on the viability of the scheme and the Council's approach to rents, etc.. Such an approach is consistent with Policy EMP 7 of the UDP and the draft Town Centre Planning Strategy for Finchley Church End (March 2010) which advises that potential exists to refurbish to provide a mix of uses which may include improved offices, residential units and new community and hotel uses at Gateway House.

(Emphasis on "may").

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

New community uses need to be considered in proposals in town centres.

---

**Representation No: 597 / 1**

**Name :** Cllr Jim Tierney

**Organisation :** Labour Group

**Policy** Policy DM02: Development standards

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

The UDP policy H18 states that there needs to be 5 square metres of amenity space per habitable room. This is not always observed for developments and rarely observed where houses are being converted into flats where the flat or flats on the first floor and above are given no garden access. S106 contributions to enhance the parks is no substitution.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Further detail has been added to the supporting text which sets out that the Sustainable Design and Construction SPD will contain the amenity space standards and they will be similar or improve upon the existing standards contained in the UDP. The SPD could be monitored to help identify the level of delivery. It can set realistic provision for conversions if this is considered appropriate. As the policy sets out there will be some exceptions where the density and/or site layout precludes the provision of private garden space.

---

**Representation No: 597 / 2**

**Name :** Cllr Jim Tierney

**Organisation :** Labour Group

**Policy** Policy DM04: Environmental considerations for development

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

In dealing with sites that are possibly contaminated the policy should state that the investigation to establish the presence and extent of contamination will be carried out by a firm appointed by the Council and not at all connected with the developer. The cost of treating a contaminated site can be used by a developer as an excuse to offset the need to provide affordable housing.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Policy DM04 sets out that the developer will need to agree with the Council the remediation works necessary before development starts. Contaminated land can be an exceptional cost where it has not already been identified in the development process. As identified in the affordable housing policy these situations can warrant a reduction in the affordable housing requirement.

---

**Representation No: 597 / 3**

**Name :** Cllr Jim Tierney

**Organisation :** Labour Group

**Policy** Policy DM08: Ensuring a variety of sizes of new homes to meet housing need

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

The emphasis here is on maximising housing choice. But surely the emphasis should be on providing the houses families on our housing waiting list need? For example a couple with a son and daughter will need a three bed house or flat and that's that. Their need should not be disguised as aspirational or whatever. Their need is also our need to house them.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Maintaining and increasing the supply of family housing is a priority in Barnet as housing delivery since 2004 has been dominated by smaller flatted homes. The policy sets out the priority which is for family housing of 3 or more bedrooms across all the tenures. The north London SHMA sets out these needs in more detail.

Barnet as of April 2011 will no longer operate an open housing waiting list as we do not consider it to be a true reflection of housing needs. We are changing our housing allocations scheme in order to identify priority housing. This will enable us to find suitable housing, including family homes, quickly for people who are in high housing need.

---

**Representation No: 597 / 4**

**Name :** Cllr Jim Tierney

**Organisation :** Labour Group

**Policy** Policy DM10: Affordable housing contributions

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

The text states that the public response to consultation was that we must deliver enough affordable housing to meet our needs. The UDP (2006) and The London Plan (2008) ask for 50% affordable housing. This policy reduces it to 30% and that only for sites of 15 units or more and even then only if viable. It is not as if our affordable housing need has diminished since the UDP and the London Plan were adopted. This policy will not deliver the affordable houses we need.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

A viability study was carried out as part of the evidence base and demonstrates that whilst 50% is viable it is only in a few cases. Therefore a minimum target has been set for schemes of 15 units of 30% or more affordable housing. This will ensure delivery of a minimum level of affordable housing on these sites. For schemes that are between 10 and 14 units, if they can demonstrate viability issues, then the amount of affordable housing may be reduced. Need has to be balanced against viability in order to deliver affordable housing. The policy will continue to be monitored so delivery can be compared.

---

**Representation No: 597 / 5**

**Name :** Cllr Jim Tierney

**Organisation :** Labour Group

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The statement that proposals for significant retail use outside town centres will be refused is important. We need to retain town centre boundaries. Residential use should not be discouraged. People often like to live in town centres.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The approach to new retail is sequential in order to promote town centres vitality and viability. Town centres are also appropriate locations for residential accommodation and the mixed use element of the policy aims to support this.

---

**Representation No: 597 / 6**

**Name :** Cllr Jim Tierney

**Organisation :** Labour Group

**Policy** Policy DM17: Travel impact and parking standards

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The policy follows PPG13 which was published 9 years ago the main purpose of which is sustainable transport and a reduction in reliance on the car. The policy is detailed makes the point strongly.

---

**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The policy has to be in line with PPG13 on Sustainable Transport and the approach set out in the Core Strategy.

---

**Representation No: 598 / 1**

**Name :** Mr S.H Price

**Organisation :** Mays Lane Gospel Hall Trust

**Policy** Policy DM13: Community and education space

**Chapter:**

**Paragraph:**

12.1.4

---

**Reason for Objecting or Supporting?:**

Omit "include" and insert are "primarily". Then Separate the lists of uses given as examples for each class D1 and D2 in order.

1. The Equalities Impact Assessment acknowledged that there was a medium risk of different communities receiving "different service outcomes" by virtue of delivery of the policy.
  2. The Sustainability Appraisal stated that the policy was "wide ranging" from leisure uses to meeting spaces and assessed three strands: loss, new, impact.
  3. The wording could be improved for clarity of policy support.
- 

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Reference to D1/D2 uses has been removed. The word include has been retained.

---

**Representation No: 598 / 2**

**Name :** Mr S.H Price

**Organisation :** Mays Lane Gospel Hall Trust

**Policy** Policy DM13: Community and education space

**Chapter:**

**Paragraph:** Para. 12.1.5

---

**Reason for Objecting or Supporting?:**

Insert after "many facilities" the words "especially those provided by the voluntary not for profit sector".

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The supporting text has been redrafted. Whilst the work of the voluntary and not for profit sector is important the policy covers all community, health and education uses which also includes the public and private sectors.

---

**Representation No: 598 / 3**

**Name :** Mr S.H Price

**Organisation :** Mays Lane Gospel Hall Trust

**Policy** Policy DM13: Community and education space

**Chapter:**

**Paragraph:** Para. 12.1.7

---

**Reason for Objecting or Supporting?:**

After "Redevelopment of a site" continue "may be permitted where the above factors are" thus omitting "will be permission provided that". Change the last line to say "provided accessibility and impact are favourable".

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The sentence has been redrafted. The reference to impact has been clarified to reference residential amenity.

---

**Representation No: 598 / 4**

**Name :** Mr S.H Price

**Organisation :** Mays Lane Gospel Hall Trust

**Policy** Policy DM13: Community and education space

**Chapter:**

**Paragraph:** Para.12.1.8

---

**Reason for Objecting or Supporting?:**

Insert the word "community" after "new". In the second line omit "will" and put "should". In the fourth line change the word "for" into "in locating" and omit the word "can".

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The supporting text has been redrafted.

---

**Representation No: 598 / 5**

**Name :** Mr S.H Price

**Organisation :** Mays Lane Gospel Hall Trust

**Policy** Policy DM13: Community and education space

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

In the third line up it is suggested that to the local community" is necessary.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The policy has been redrafted

---

**Representation No: 599 / 1**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Introduction

**Chapter:**

**Paragraph:** 1.1.1 to 15.5.1

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**Reason for Objecting or Supporting?:**

GENERAL

Apostrophes need scrutiny throughout; Barnet must not give the impression of illiteracy.

The maps must be made much clearer.

'Sustainability Appraisal' should be deleted at the top of each page; this is not the sustainability appraisal document.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

These issues have been addressed in the Submission Draft.

---

**Representation No: 599 / 2**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Introduction

**Chapter:**

**Paragraph:** 1.2.3

---

**Reason for Objecting or Supporting?:**

Flexibility in a policy leads to uncertainty for applicants and objectors alike, and makes it much more difficult to sustain a refusal on appeal if the policy before the Inspector is vague.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Reference to applying policies flexibly has been removed from the introduction.

---

**Representation No: 599 / 3**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Introduction

**Chapter:**

**Paragraph:** 1.3.1.

---

**Reason for Objecting or Supporting?:**

The more documents an applicant or objector has to refer to the more difficulty for applicants and objectors to know where they stand.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The DMP DPD aims to highlight the links with both national guidance, the Core Strategy and Supplementary Planning Guidance or design guidance. It will also set out further references which should guide applicants and affected parties.

---

**Representation No: 599 / 4**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM01: Protecting Barnet's character and amenity

**Chapter:**

**Paragraph:** 2.3.2

---

**Reason for Objecting or Supporting?:**

To 'conservation areas' should be added the 'classic suburban areas' the Finchley Society is seeking in its representations on the Core Strategy (see especially that on CS1)

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

National policy does not require special character areas to be defined. The Core Strategy makes it clear how we are going to take forward the typologies identified in the Characterisation Study. We do not intend to introduce special character areas.

---

**Representation No: 599 / 5**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM01: Protecting Barnet's character and amenity

**Chapter:**

**Paragraph:**

2.4.2

---

**Reason for Objecting or Supporting?:**

I support this generally, but observe that sometimes dramatic changes in style, rather than bland pastiche, can be a good thing.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

We welcome this support

---

**Representation No: 599 / 6**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM01: Protecting Barnet's character and amenity

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

DM01 This is much too imprecise; other boroughs (e.g. Westminster) are more precise in the Core Strategy itself (I note that the demerits of imprecision are clearly stated in the last sentence of 10.9.3.). Here and elsewhere 'expected' should be replaced by 'required'. SPDs must be produced simultaneously with the DMPD, or there should be a mechanism for saving existing policies in the meantime.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Policy wording throughout the document which stated 'should meet' in the preferred approach has been changed to 'will meet' for the submission version. Further detail will be provided in the Residential Design Guidance SPD which will be developed after the DPD. The role of the SPD is to supplement adopted policies in the DPD and provide further guidance. SPDs therefore follow on from DPDs after adoption.

---

**Representation No: 599 / 7**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM01: Protecting Barnet's character and amenity

**Chapter:**

**Paragraph:**

2.6.2

---

**Reason for Objecting or Supporting?:**

The objections to this alternative approach are not convincing. It should be adopted, incrementally, suburban area by suburban area.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

National policy does not require special character areas to be defined. The Core Strategy makes it clear how we are going to take forward the typologies identified in the Characterisation Study. We do not intend to introduce special character areas.

---

**Representation No: 599 / 8**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM01: Protecting Barnet's character and amenity

**Chapter:**

**Paragraph:**

3.1.3

---

**Reason for Objecting or Supporting?:**

Something has gone wrong with the draft: 'in Barnet and London' is nonsense; Barnet is part of Greater London.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The supporting text has been revised

---

**Representation No: 599 / 9**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM03: Accessibility and inclusive design

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

In the fifth paragraph 'buildings' must be defined - surely private houses do not have to be accessible - are 'public' buildings meant? In the ninth 'normally' needs some definition, to give proper guidance to developers and potential objectors alike. The last paragraph should make clear that the improvement of existing facilities as an alternative to the provision of play space for children is acceptable only if the existing facilities are not too far away.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The supporting text has been amended to clarify that it refers to all buildings which are accessible to the general public such as shops and community facilities.

Supporting text has been redrafted

---

**Representation No: 599 / 10**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM04: Environmental considerations for development

**Chapter:**

**Paragraph:**

4.4.4

---

**Reason for Objecting or Supporting?:**

Add 'mitigating' before 'climate change'. Replace the meaningless 'consider' by 'will be required to'.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The supporting text has been redrafted

---

**Representation No: 599 / 11**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM04: Environmental considerations for development

**Chapter:**

**Paragraph:** 4.4.6

---

**Reason for Objecting or Supporting?:**

Replace 'applications' at the end by 'permissions'.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

'applications' has been replaced by the word 'permissions'

---

**Representation No: 599 / 12**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM06: Barnet's heritage and conservation

**Chapter:**

**Paragraph:** 5.3.1

---

**Reason for Objecting or Supporting?:**

Would that it were possible to protect locally listed buildings from demolition; in the absence of the long-awaited Heritage Bill, it is not. Table 3. Policy HE3 from PPS5 should also be cited here.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The supporting text has identified HE3 and the stimulus that it can have.

---

**Representation No: 599 / 14****Name :** Mr Peter Pickering**Organisation :** Peter Pickering**Policy** Policy DM06: Barnet's heritage and conservation**Chapter:****Paragraph:**

5.5.3

**Reason for Objecting or Supporting?:**

The first bullet point is an encouragement to let buildings deteriorate, and should be dropped, in accordance with HE7.6 of PPS5 (Where there is evidence of deliberate neglect of or damage to a heritage asset in the hope of obtaining consent, the resultant deteriorated state of the heritage asset should not be a factor taken into account in any decision.) If there is a real problem with condition, and it is not in any sense the fault of the applicant, it can be brought up in the demonstration of efforts to keep the building in use.

**If you are Objecting, what changes are you seeking?:****Council's response :**

The supporting text has been redrafted to clarify that all three bullet points need to be considered.

**Representation No: 599 / 15****Name :** Mr Peter Pickering**Organisation :** Peter Pickering**Policy** Policy DM06: Barnet's heritage and conservation**Chapter:****Paragraph:**

5.7.4

**Reason for Objecting or Supporting?:**

I am sure there should be a reference here to the need for conditions requiring assessment prior to the granting of consent where there is a likelihood of there being archaeological remains, and for conditions on the consent if given requiring proper archaeological investigation and preservation in situ or recording (with public availability) of any remains found. Policy HE12 of PPS5 is relevant here, and I see some merit in the formulation I found in a draft recently published by Havering Council - Heritage Draft SPD- (The Council will ensure that the archaeological significance of sites is taken into account when making planning decisions and will take appropriate measures to safeguard that interest. Planning permission will only be granted where satisfactory provision is made in appropriate cases for preservation and recording of archaeological remains in situ or through excavation. Where nationally important archaeological remains exist there will be a presumption in favour of their physical preservation. Particular care will need to be taken when dealing with applications in archaeological 'hotspots' where there is a greater likelihood of finding remains.) I am very happy to discuss this with you on behalf of the Hendon and District Archaeological society at some convenient time.

**If you are Objecting, what changes are you seeking?:****Council's response :**

Substantive changes have been made to the supporting text to clarify the protection of archaeological remains in the borough.

**Representation No: 599 / 16**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM06: Barnet's heritage and conservation

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

DM04 should include a policy that consent for any development that may damage a buried archaeological resource (whether in one of these areas or not) will include appropriate conditions requiring the prior investigation of that resource and the publication and archiving of the results of that investigation; there should be a reference to policy HE12 of PPS5.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Policy in relation to archaeological remains has been revised to ensure remains found across the borough are protected.

---

**Representation No: 599 / 17**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM07: Protecting housing in Barnet

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

I wonder if the policy here has been fully thought through. Are there no large housing estates in the borough where some diversification might even be desirable? Could there not be places where a new local convenience store, or a source of employment, was wanted? Chapter 11 is keen to keep existing parades; might there not be an equal case for getting new ones? As for GP surgeries, may not the days of small practices be over, and larger health centres be needed? DM05 iv. This is badly drafted. There are obscure negatives, and 'type' at the end cannot be the word that is wanted. Should 'but' be 'and' or 'or'? DM05 v 'provide' for 'provides'.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The principle is to prevent the loss of housing. A few exceptions are intended to be permitted. A corner shop is not identified.

The policy has been redrafted.

---

**Representation No: 599 / 18**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM08: Ensuring a variety of sizes of new homes to meet housing need

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

This is all so general, and I do not see how any refusal based on it could be supported on appeal (cf the last sentence of 10.9.3.).

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The policy is informed by the evidence set out in the SHMA on household types.

---

**Representation No: 599 / 19**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM08: Ensuring a variety of sizes of new homes to meet housing need

**Chapter:**

**Paragraph:** 7.6.1

---

**Reason for Objecting or Supporting?:**

Should not a half-way house be considered - a range of allowable percentages of each type of dwelling for developments of above a certain size?

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The policy is informed by the evidence set out in the SHMA on household types. It states that developments should provide a mix of dwelling sizes and sets out the priorities for different tenures. A range of percentages may restrict the Council from ensuring that a suitable development delivers the maximum housing mix priority.

---

**Representation No: 599 / 20**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM09: Specialist housing

**Chapter:**

**Paragraph:**

8.5.2

---

**Reason for Objecting or Supporting?:**

Will people who need extra care homes be able to walk even 500 metres?

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

This is more about ensuring accessibility for staff and visitors. The distance is indicative and is meant to relate to all types of care homes.

---

**Representation No: 599 / 21**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM09: Specialist housing

**Chapter:**

**Paragraph:**

8.6.1

---

**Reason for Objecting or Supporting?:**

HMOs are also used by young professional etc people embarking on careers.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Reference to those on low incomes is included.

---

**Representation No: 599 / 22**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM09: Specialist housing

**Chapter:**

**Paragraph:**

8.8.1

---

**Reason for Objecting or Supporting?:**

What is the problem with over-supply except for the promoters of these homes, who may lose money? For consumers, maximum choice is desirable.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The problem with an over-supply of residential care homes is set out in the Core Strategy (section 16.4). It has major cost implications for the Council and NHS Barnet.

---

**Representation No: 599 / 23**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:**

10.4.2

---

**Reason for Objecting or Supporting?:**

10.4.2 Add religious facilities.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Planning policy in PPS4 does not identify religious facilities specifically as town centre uses.

---

**Representation No: 599 / 24**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:** 10.7.1

---

**Reason for Objecting or Supporting?:**

Perhaps local consumers want large retail stores, and are not so bothered that their area is like most others - after all it is their area that they use.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Ensuring that large scale retail redevelopment provides a mix of shop units could help provide for smaller independent retailers. The policy only refers to comprehensive retail redevelopment. It is not intended to be discouraging large scale retail from developing in Barnet's town centres simply encouraging smaller units.

---

**Representation No: 599 / 25**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:** 10.8.1

---

**Reason for Objecting or Supporting?:**

10.8.1 'principal' not 'principle'. Give an indication when and how the review of town centre frontage targets will be reviewed; as it is, Table 7, where the two operative columns are the same for all entries, seems a bit odd.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Please see the Background Report: District Centre Frontages which sets out the results of the latest town centre survey of the district centres in the borough.

---

**Representation No: 599 / 26**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

DM09 In the fifth paragraph delete 'known', which adds nothing but weakens the strong 'demonstrated'.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The word 'known' has been deleted.

---

**Representation No: 599 / 27**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:** 10.9.3

---

**Reason for Objecting or Supporting?:**

Add 'and more difficult to defend on appeal' at the end.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

These paragraphs have been deleted.

---

**Representation No: 599 / 28**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM12: Maintaining our local centres and parades

**Chapter:**

**Paragraph:**

11.3.2

---

**Reason for Objecting or Supporting?:**

11.3.2 'centres' not 'centre'.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Amended

---

**Representation No: 599 / 29**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM12: Maintaining our local centres and parades

**Chapter:**

**Paragraph:**

11.3.3

---

**Reason for Objecting or Supporting?:**

I presume there is no way of controlling the proliferation of charity shops, which can make a shopping area look down at heel.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Types of shop such as charity shops cannot be controlled by the planning system.

---

**Representation No: 599 / 30**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM13: Community and education space

**Chapter:**

**Paragraph:**

12.1.3

---

**Reason for Objecting or Supporting?:**

Table 9 'protection and enhancement of social infrastructure' is the title, not part, of Policy 3.17, and should be separated by inverted commas.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Amended

---

**Representation No: 599 / 31**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM13: Community and education space

**Chapter:**

**Paragraph:**

12.1.8

---

**Reason for Objecting or Supporting?:**

Add 'at particular times' after 'demand for travel (and for elegance change 'particular' at the beginning of the sentence to 'special').

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The supporting text has been redrafted.

---

**Representation No: 599 / 32**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM14: New and existing employment space

**Chapter:**

**Paragraph:**

13.2.1

---

**Reason for Objecting or Supporting?:**

13.2.1 'commuter employment' not 'community employment'.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Amended

---

**Representation No: 599 / 33**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM14: New and existing employment space

**Chapter:**

**Paragraph:**

13.5.2

---

**Reason for Objecting or Supporting?:**

Is it justifiable to give warehouses (B8) preference over offices; warehouses use much land, attract heavy traffic, and provide fewer jobs than offices.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Further policy has been added which covers the intensity of employment

---

**Representation No: 599 / 34**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM14: New and existing employment space

**Chapter:**

**Paragraph:**

13.5.3

---

**Reason for Objecting or Supporting?:**

Should the North London Business Park, an attractive office location, not be a protected location?

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

North London Business Park is identified as a locally significant site. It is also identified in the London Plan as an Industrial Business Park.

---

**Representation No: 599 / 35**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM14: New and existing employment space

**Chapter:**

**Paragraph:**

13.6.3

---

**Reason for Objecting or Supporting?:**

13.6.3 'might' for 'may'.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

These paragraphs have been deleted

---

**Representation No: 599 / 36**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM15: Green Belt and open spaces

**Chapter:**

**Paragraph:**

14.7.4

**Reason for Objecting or Supporting?:**

14.7.4 What might 'appropriate compensation' be? Explain.

**If you are Objecting, what changes are you seeking?:**

**Council's response :**

The approach set out is the sequential approach set out in the London Plan. The supporting text has been revised to clarify the circumstances where harm is permissible. There are many areas of differing nature conservation value in Barnet and compensation could fund improvements to the access to these or replacement habitat could be made to other local nature conservation areas.

**Representation No: 599 / 37**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM15: Green Belt and open spaces

**Chapter:**

**Paragraph:**

**Reason for Objecting or Supporting?:**

DM13 Open space. Should it not be possible to achieve additional (not just improved) public open space? In the last sentence of that paragraph, accessibility to what?

**If you are Objecting, what changes are you seeking?:**

**Council's response :**

The policy requires development to provide additional public open space in areas which are identified as deficient in public open space.

Accessibility is referenced in relation to other open spaces

**Representation No: 599 / 38**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM17: Travel impact and parking standards

**Chapter:**

**Paragraph:**

15.4.4

---

**Reason for Objecting or Supporting?:**

15.4.4 For 'consider restricting' say 'will, save in exceptional circumstances, prevent' (see the sixth bullet point in DM14).

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The approach to car free development has been re drafted

---

**Representation No: 599 / 39**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM17: Travel impact and parking standards

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

Quote the PTAL in the fourth bullet point.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The approach to car free development has been re drafted

---

**Representation No: 599 / 40**

**Name :** Mr Peter Pickering

**Organisation :** Peter Pickering

**Policy** Policy DM18: Telecommunications

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

DM15 second bullet point. Add locally listed buildings.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Reference is now made to 'all heritage assets' which includes locally listed buildings.

---

**Representation No: 600 /**

**Name :** Miss Rachael Bust

**Organisation :** The Coal Authority

**Policy**

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

---

**Representation No: 601 / 1**

**Name :** Rebecca Burnhams

**Organisation :** Universities Superannuation Scheme (USS)

**Policy** Policy DM14: New and existing employment space

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

USS supports Policy DM12: New and existing employment space which seeks to safeguard existing employment spaces and sets out where and when alternative uses might be considered.

USS supports Barnet's approach to preserving employment sites, where viable, but urges the Council to consider alternative uses if there is a valid viability argument, or if the site could be considered suitable for alternative uses. This flexibility should be built into the policy.

USS notes that its commercial property at Finchley Industrial Centre is designated as a Locally Significant Industrial Site or Business Location and that a change of use from employment space would not be permitted. On this basis, USS urges the Council to include flexibility in the document that allows a range of employment uses and supporting services at these sites, when justified and appropriate to ensure that employment within the borough can be maximised.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The site was assessed as part of the Employment Land Survey and it scored well across all categories so is being retained as a Locally Significant Industrial Location.

The supporting text for policy for Locally Significant Industrial Sites and Business Locations has been clarified as these locations are intended to protect against any change from business use in order to maintain strategic sites for employment in the borough.

---

**Representation No: 602 / 2**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Introduction

**Chapter:**

**Paragraph:**

1.2.3

---

**Reason for Objecting or Supporting?:**

1.2.3: Flexibility in a policy leads to uncertainty for applicants and objectors alike, and makes it much more difficult to sustain a refusal on appeal if the policy before the Inspector is vague.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Reference to applying policies flexibly has been removed from the introduction.

---

**Representation No: 602 / 3****Name :** Mr Mike Dawson**Organisation :** Finchley Society**Policy** Introduction**Chapter:****Paragraph:**

1.3.5

**Reason for Objecting or Supporting?:**

1.3.1:The more documents an applicant or objector has to refer to the more difficulty for applicants and objectors to know where they stand.

1.3.5:This evidence base is not sound. For example, the Characterisation Study failed to nominate new areas of 'Special Character', which deserved extra protection apart from Conservation Areas. By excluding areas of special character while setting new development policy that will affect potential new areas of special character, is failing to comply with National Policy that requires new areas to be defined.

**If you are Objecting, what changes are you seeking?:****Council's response :**

The DMP DPD aims to highlight the links with both national guidance and the Core Strategy. It will also set out further references which should guide applicants and affected parties.

National policy does not require special character areas to be defined. The Core Strategy makes it clear how we are going to take forward the typologies identified in the Characterisation Study. We do not intend to introduce special character areas.

**Representation No: 602 / 4****Name :** Mr Mike Dawson**Organisation :** Finchley Society**Policy** Policy DM01: Protecting Barnet's character and amenity**Chapter:****Paragraph:**

2.3.2

**Reason for Objecting or Supporting?:**

2.3.2:To 'conservation areas' should be added the 'classic suburban areas' and 'areas of special character'.

**If you are Objecting, what changes are you seeking?:****Council's response :**

National policy does not require special character areas to be defined. The Core Strategy makes it clear how we are going to take forward the typologies identified in the Characterisation Study. We do not intend to introduce special character areas.

**Representation No: 602 / 5**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM01: Protecting Barnet's character and amenity

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

DM01:

This is much too imprecise; other boroughs (e.g. Westminster) are more precise in the Core Strategy itself (we note that the demerits of imprecision are clearly stated in the last sentence of 10.9.3.). Here and elsewhere 'expected' should be replaced by 'required'. SPDs must be produced simultaneously with the DMPD, or there should be a mechanism for saving existing policies in the meantime.

Last bullet point should set a percentage of house in 'single family occupation, below which conversions will not be allowed. We suggest 90%.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Policy wording throughout the document which stated 'should meet' in the preferred approach has been changed to 'will meet' for the submission version. Further detail will be provided in the Residential Design guidance SPD which will be developed after the DPD. The role of the SPD is to supplement adopted policies in the DPD and provide further guidance. SPDs therefore follow on from DPDs after adoption.

---

**Representation No: 602 / 6**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM01: Protecting Barnet's character and amenity

**Chapter:**

**Paragraph:** 2.6.2

---

**Reason for Objecting or Supporting?:**

2.6.2: The objections to this alternative approach are not convincing. It should be adopted, incrementally, suburban area by suburban area. The failure by Barnet Council to provide this evidence in their recent Characterisation Study is no reason to stop this proposal.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The Core Strategy makes it clear how we are going to take forward the typologies identified in the Characterisation Study. We do not intend to introduce special character areas.

---

**Representation No: 602 / 7**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM02: Development standards

**Chapter:**

**Paragraph:** 3.1.3

---

**Reason for Objecting or Supporting?:**

Last sentence, replace 'should' with 'will'. There is scope for changing character where appropriate later in the sentence. Removing 'should' does not stop new build or change within local character. In the first sentence remove 'general'. You have stated that 'By Design' is a National guideline policy Barnet Council will follow. You then say this guideline will be followed 'in general'. Confusion would follow. In 1.2.1 you state that you want to solve problems, not create them.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Policy wording throughout the document which stated 'should meet' in the preferred approach has been changed to 'will meet' for the submission version.

The principles set out in By design will be taken into account.

---

**Representation No: 602 / 8**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM02: Development standards

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

First paragraph, remove 'be expected to'. This allows confusion and problems.

The second paragraph, which uses 'will require', shows the weakness of the first paragraph.

Third and fourth paragraph, remove 'be expected to'.

The last paragraph should make clear that the improvement of existing facilities as an alternative to the provision of play space for children is acceptable only if the existing facilities are not too far away.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The policy and supporting text have been redrafted.

---

**Representation No: 602 / 9**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM04: Environmental considerations for development

**Chapter:**

**Paragraph:** 4.4.4

---

**Reason for Objecting or Supporting?:**

Add 'mitigating' before 'climate change'. Replace the meaningless 'consider' by 'will be required to'.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The supporting text has been redrafted

---

**Representation No: 602 / 10**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM04: Environmental considerations for development

**Chapter:**

**Paragraph:** 4.4.5

---

**Reason for Objecting or Supporting?:**

All new developments that cause additional vehicle use must reduce local air quality unless there is a requirement for all vehicles associated with them to be electric.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

In line with the Core Strategy the policy should not restrict peoples ability to choose their mode of transport. It is not a realistically enforceable planning policy to restrict all new development to only electric vehicle use.

---

**Representation No: 602 / 11**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM04: Environmental considerations for development

**Chapter:**

**Paragraph:** 4.4.6

---

**Reason for Objecting or Supporting?:**

Replace 'applications' at the end by 'permissions'.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

'applications' has been replaced by the word 'permissions'

---

**Representation No: 602 / 12**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM04: Environmental considerations for development

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

First paragraph, remove 'be expected to'.  
Second, third fourth, fifth and eighth paragraph, remove 'should' and replace with 'will'.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The policy has been redrafted

---

**Representation No: 602 / 13**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM06: Barnet's heritage and conservation

**Chapter:**

**Paragraph:** 5.5.3

---

**Reason for Objecting or Supporting?:**

The first bullet point is an encouragement to let buildings deteriorate, and should be dropped, in accordance with HE7.6 of PPS5 (Where there is evidence of deliberate neglect of or damage to a heritage asset in the hope of obtaining consent, the resultant deteriorated state of the heritage asset should not be a factor taken into account in any decision.) If there is a real problem with condition, and it is not in any sense the fault of the applicant, it can be brought up in the demonstration of efforts to keep the building in use.

An example of how neglect can lead to demolition of a listed building is Grove Lodge. Despite Barnet Council serving a Section 215 Notice to make repairs on the owners of Grove Lodge on 13th April 2006, this historic building in Regents Park Road, Finchley, was left to rot. The notice required that specified remedial work be carried out by 25th September 2006.

When Barnet Council Enforcement officers were asked to act, they would not. Further, a senior officer was of the opinion that demolition would offer a better building! In the final event, the owner decided to restore the building, no thanks to council officers.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The supporting text has been redrafted to clarify that all three bullet points need to be considered.

Grove Lodge has recently been restored and brought back into use following successful negotiations between the owners and planning officers.

---

**Representation No: 602 / 14**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM06: Barnet's heritage and conservation

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

Add the following PPS 5 reference to second paragraph after "...HE9": "and HE7.6"

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Reference to HE7.6 has been added.

---

**Representation No: 602 / 15**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM08: Ensuring a variety of sizes of new homes to meet housing need

**Chapter:**

**Paragraph:** 7.1.1 to7.6.2

---

**Reason for Objecting or Supporting?:**

This section fails to 'Ensure' any specific supply of housing need, yet alone on the basis of need shown in evidence elsewhere in this DMP and Core Strategy

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The policy is informed by the evidence set out in the SHMA on household types.

---

**Representation No: 602 / 16**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM08: Ensuring a variety of sizes of new homes to meet housing need

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

The first sentence is false. The DMP is not, "Ensuring a variety of sizes of new homes to meet housing need" because it is not basing provision on the defined needs in the evidence base. As such the policy is not following National and London policy guidance.

This policy must be rewritten.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The policy is informed by the evidence set out in the SHMA on household types.

---

**Representation No: 602 / 17**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM09: Specialist housing

**Chapter:**

**Paragraph:**

8.5.2

---

**Reason for Objecting or Supporting?:**

Will people who need extra care homes be able to walk even 500 metres?

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

This is more about ensuring accessibility for staff and visitors. The distance is indicative and is meant to relate to all types of care homes

---

**Representation No: 602 / 18**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM09: Specialist housing

**Chapter:**

**Paragraph:**

8.6.1

---

**Reason for Objecting or Supporting?:**

HMO's are also used by young professional etc people embarking on careers.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Reference to those on low incomes is included.

---

**Representation No: 602 / 19**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM09: Specialist housing

**Chapter:**

**Paragraph:**

8.8.1

**Reason for Objecting or Supporting?:**

What is the problem with over-supply except for the promoters of these homes, who may lose money? For consumers, maximum choice is desirable.

**If you are Objecting, what changes are you seeking?:**

**Council's response :**

The problem with an over-supply of residential care homes is set out in the Core Strategy (section 16.4). It has major cost implications for the Council and NHS Barnet.

**Representation No: 602 / 20**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:**

10.2.1

**Reason for Objecting or Supporting?:**

10.2, What you said:

10.2.1: This section fails to mention that while some people supported flats in town centres, they supported such on the basis that flats without an allocated car parking space should be denied a CPZ permit. This joined-up policy helps to limit the dual possibilities of too many CPZ permits for limited spaces and general congestion. This important aspect is not mentioned here.

**If you are Objecting, what changes are you seeking?:**

**Council's response :**

The 'what you said' section is a summary of comments received. It did not include every response. Additional text has been added and a cross reference with policy DM14 included. This policy permits car free development provided the policy is satisfied.

**Representation No: 602 / 21**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:** 10.5.4

---

**Reason for Objecting or Supporting?:**

Small Shops:Reference to 'clone towns' does reflect the choice of shops people may want, in particular the example of large retail shops. A shop people want to use, be it large or small, can reduce car use to places like Brent Cross. In direct contrast to 'ultimately limiting choice in Barnet's town centres', popular large shops increase choice locally and could reduce the dominance of Brent Cross, which limits choice elsewhere.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Ensuring that large scale retail redevelopment provides a mix of shop units could help provide for smaller independent retailers. The policy only refers to comprehensive retail redevelopment. It is not intended to be discouraging large scale retail from developing in Barnet's town centres simply encouraging smaller units.

---

**Representation No: 602 / 21**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

In the fifth paragraph delete 'known', which adds nothing but weakens the strong 'demonstrated'  
Add new paragraph under Mixed use development, saying:  
'New and converted mixed-use development of tall buildings will include a community facility'.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The word 'known' has been deleted. Specific reference to tall buildings and the provision of community space is not necessary.

---

**Representation No: 602 / 22**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:** 10.7.1

---

**Reason for Objecting or Supporting?:**

Perhaps local consumers want large retail stores, and are not so bothered that their area is like most others - after all it is their area that they use.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Ensuring that large scale retail redevelopment provides a mix of shop units could help provide for smaller independent retailers. The policy only refers to comprehensive retail redevelopment. It is not intended to be discouraging large scale retail from developing in Barnet's town centres simply encouraging smaller units.

---

**Representation No: 602 / 23**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:** 10.8.1

---

**Reason for Objecting or Supporting?:**

10.8.1:'principal 'not 'principle'. Give an indication when and how the review of town centre frontage targets will be reviewed; as it is, Table 7, where the two operative columns are the same for all entries, seems a bit odd.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Please see the Background Report: District Centre Frontages which sets out the results of the latest town centre survey of the district centres in the borough

---

**Representation No: 602 / 25**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM12: Maintaining our local centres and parades

**Chapter:**

**Paragraph:** 11.3.1

---

**Reason for Objecting or Supporting?:**

West Finchley is omitted from this list. Please include it unless it is covered by the general classification of 'local centres'

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

West Finchley is a parade of shops which is why it is not on the list of local centres.

---

**Representation No: 602 / 26**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:** 10.6.1

---

**Reason for Objecting or Supporting?:**

Small Shops:Reference to 'clone towns' does reflect the choice of shops people may want, in particular the example of large retail shops. A shop people want to use, be it large or small, can reduce car use to places like Brent Cross. In direct contrast to 'ultimately limiting choice in Barnet's town centres', popular large shops increase choice locally and could reduce the dominance of Brent Cross, which limits choice elsewhere.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Ensuring that large scale retail redevelopment provides a mix of shop units could help provide for smaller independent retailers. The policy only refers to comprehensive retail redevelopment. It is not intended to be discouraging large scale retail from developing in Barnet's town centres simply encouraging smaller units.

---

**Representation No: 602 / 27**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM13: Community and education space

**Chapter:**

**Paragraph:** 12.4.6 - 12.1.9

---

**Reason for Objecting or Supporting?:**

This statement is both misleading and fails to include similar/worse noise/traffic generating schemes the Barnet Council is encouraging; hotels. We question why such an unbalanced argument is given? The item should be omitted

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Hotels are not a community facility and their development is restricted to town centres in particular accessible town centres.

---

**Representation No: 602 / 28**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM14: New and existing employment space

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

13.5.3: We are surprised that the North London Business Park, an modern office location being fully occupied, is not a protected location. Please include this site, as not to do so would be contrary to National and London guidelines.

Locally Significant Industrial Sites and Business Locations (LSISBL):

We note that Meadow Works has been omitted from this list but is in the Core Strategy list for such sites. Please include Meadow Works in the LSISBL list

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

North London Business Park is identified as a locally significant site. It is also identified in the London Plan as an Industrial Business Park.

Meadow Works is identified as Pricklers Hill in the Core Strategy and has not been taken forward as a Locally Significant Industrial site in the DMP DPD. The site scored poorly in the Employment Land Review because it was low quality and offered limited potential for redevelopment. It is also fairly isolated from public transport. For these reasons it was considered unsuitable to continue protection as a Locally Significant Industrial site.

---

**Representation No: 602 / 29**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM15: Green Belt and open spaces

**Chapter:**

**Paragraph:** 14.4.1

---

**Reason for Objecting or Supporting?:**

We note that 'Stanley Road Playing Fields' in East Finchley has been omitted from 'Barnet's Open Space, Sport and Recreational Facilities Needs Assessment'. Please correct this and include 'Stanley Road Playing Fields' in this list

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Stanley Road playing fields were not included because at the time of the playing fields survey they were not in active use.

---

**Representation No: 602 / 30**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM15: Green Belt and open spaces

**Chapter:**

**Paragraph:** 14.5.2 /14.6.1

---

**Reason for Objecting or Supporting?:**

14.5.2/14.6.1:In the first sentence add 'appropriate' after:  
"...will be protected and any appropriate

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The supporting text has been redrafted. It makes clear that development on open space will be acceptable in exceptional circumstances.

---

**Representation No: 602 / 31**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM15: Green Belt and open spaces

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

Green Belt/MOL:In the first sentence remove 'would' and replace with 'will'.

Open Space:At the end of the third sentence ending with, 'open space', add:

"plus the contribution that would be required for all new development in areas which are identified as deficient in public open space".

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Policy wording throughout the document which stated 'should' in the preferred approach has been changed to 'will' for the submission version. The contribution for new development which cannot provide on site will be negotiated on a site by site basis.

---

**Representation No: 602 / 32**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM17: Travel impact and parking standards

**Chapter:**

**Paragraph:**

15.4.3

---

**Reason for Objecting or Supporting?:**

15.4.3:In the first sentence remove 'should' and replace with 'will'.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Policy wording throughout the document which stated 'should' in the preferred approach has been changed to 'will' for the submission version.

---

**Representation No: 602 / 33**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM17: Travel impact and parking standards

**Chapter:**

**Paragraph:**

15.4.4

---

**Reason for Objecting or Supporting?:**

15.4.4 For 'consider restricting' say 'will, save in exceptional circumstances, prevent' (see the sixth bullet point in DM14).

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The approach to car free development has been re drafted

---

**Representation No: 602 / 34**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM17: Travel impact and parking standards

**Chapter:**

**Paragraph:**

15.4.5

---

**Reason for Objecting or Supporting?:**

In second sentence remove 'are considered to' and replace with 'may'.  
End of third sentence ' less use of cars', not the unrealistic 'car-free travel'.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The policy has been redrafted

---

**Representation No: 602 / 35**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM17: Travel impact and parking standards

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

Quote the PTAL rating required in the fourth bullet point to read:  
"Excellent public transport accessibility (PTAL 5 or more)..."

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

The approach to car free development has been re drafted

---

**Representation No: 602 / 36**

**Name :** Mr Mike Dawson

**Organisation :** Finchley Society

**Policy** Policy DM18: Telecommunications

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

In the second bullet point add "locally listed buildings".

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Reference is now made to 'all heritage assets' which includes locally listed buildings.

---

**Representation No: 603 / 1**

**Name :**

**Organisation :** Asda Stores Ltd

**Policy** Policy DM08: Ensuring a variety of sizes of new homes to meet housing need

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

We support the flexible approach taken in draft policy DM06 to ensuring a mix of dwelling types and sizes. This will enable the council to promote large unit sizes while allowing developments to be considered on a case by case basis.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

We welcome this support

---

**Representation No: 603 / 2**

**Name :**

**Organisation :** Asda Stores Ltd

**Policy** Policy DM10: Affordable housing contributions

**Chapter:**

**Paragraph:**

---

**Reason for Objecting or Supporting?:**

We support the flexible approach taken in draft policy DM08 to affordable housing provision, which allows for a reduction in the 30% target subject to viability. This approach, sets a clear target, whilst acknowledging the significant challenges that face developers in the current economic climate.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

We welcome this support.

The expectation is for a minimum of 30% on site delivery of affordable housing subject to viability.

---

## Representation No: 603 / 3

**Name :**

**Organisation :** Asda Stores Ltd

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:** 10.1.1 to 10.9.3

---

### Reason for Objecting or Supporting?:

As set out in our submission to the draft Core Strategy Publication Stage, we consider that New Barnet has wrongly been removed from the list of key town centres for place-making and economic focus.

New Barnet has long been identified as in need of investment and as a sustainable location for development within the Borough. This is set out in the councils own evidence base, which has been compiled in support of earlier stages of the CS. No clear rationale or new evidence has been presented to support the council's position that New Barnet no longer merits specific designation as a priority town centre. As such, we request the reinstatement of New Barnet to the status of a priority town centre and the corresponding amendment of all references in the Development Management Policies DPD to include New Barnet in the list of key town centres.

---

### If you are Objecting, what changes are you seeking?:

---

#### Council's response :

The paragraph references all of Barnet's suburban town centres. New Barnet is one of these. Removing Priority Centre designation from New Barnet does not prevent such opportunities as the New Barnet gas works site being realised in accordance with the Town Centre Framework.

---

## Representation No: 603 / 4

**Name :**

**Organisation :** Asda Stores Ltd

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:** 10.1.1

---

### Reason for Objecting or Supporting?:

Reference to New Barnet should be included at paragraph 10.1.1.

---

### If you are Objecting, what changes are you seeking?:

---

#### Council's response :

The paragraph references all of Barnet's suburban town centres. New Barnet is one of these.

---

**Representation No: 603 / 5**

**Name :**

**Organisation :** Asda Stores Ltd

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:**

10.5.1

---

**Reason for Objecting or Supporting?:**

We support the council's preferred approach (para 10.5.1) to promote a mix of uses in Barnet's town centres. This will facilitate viable development opportunities that will support the vitality and viability of Barnet's town centres

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

We welcome this support

---

**Representation No: 603 / 6**

**Name :**

**Organisation :** Asda Stores Ltd

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:**

10.1.1 to 10.9.3

---

**Reason for Objecting or Supporting?:**

We note there is no reference in section 10 of the document to development density. In accordance with PPS1, PPS3, PPS4 and PPS12, the council should be seeking to promote a higher density of development close to centres and transport hubs / links in order to maximise the efficient use of land. Reference to development density in relation to centres and transport hubs should, therefore, be included in the document.

---

**If you are Objecting, what changes are you seeking?:**

---

**Council's response :**

Our approach to density is set at Core Strategy policy CS3: Distributing growth to meet housing aspirations.

---

## Representation No: 603 / 7

**Name :**

**Organisation :** Asda Stores Ltd

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:** 10.7.1 to 10.7.3  
Appendix 4

---

### **Reason for Objecting or Supporting?:**

We support the identification of town centre boundaries and primary and secondary frontages for Barnet's district centres and one major town centre as required by PPS4 and the draft replacement London Plan. However, we do not agree with the proposed boundary for New Barnet town centre, as shown on Map 8 of Appendix 4.

The town centre boundary should be extended to the north east to incorporate the southern half of the East Barnet Gas Works Site on Albert Road. The site represents the principal redevelopment opportunity in New Barnet and has been promoted for redevelopment by the council since its approval of a Planning Brief for the site in March 2000.

The site is considered to be suitable for a range of uses, due to its proximity to the existing facilities of New Barnet town centre and to the New Barnet Rail station and bus services which serve East Barnet Road. It represents the best opportunity for retail development in New Barnet that will allow for the scale of development needed to draw trade back from rival centres and generate connectivity through the centre to the benefit of existing traders. Further, it lends itself to the high density development needed to regenerate the site for a mixture of uses.

The site is currently underutilised and blights the local environment. Consequently the council should support regeneration of the site and promote its return to active use by including at least a part of the site within the New Barnet Town Centre boundary.

To this end, we would welcome the opportunity to work with the Council to prepare a site specific development brief, or to contribute to a wider Area Action Plan, within or parallel to the local plan process, designed to bring this major site back into use

---

### **If you are Objecting, what changes are you seeking?:**

#### **Council's response :**

The northern part of the site is not included as it is not part of the town centre. A Town Centre Framework for New Barnet has been developed and adopted in order to manage change within the area. The Framework responds to the brownfield opportunities in the area. Asda had the opportunity to get involved in the production of the Town Centre Framework which was adopted in November 2010. The adopted Town Centre Framework seeks to consolidate the existing town centre uses into a more compact and intensive 'core' High Street on East Barnet Road, focused around the existing Sainsbury's store. It resists significant additional retail floorspace (such as a new full service supermarket) while encouraging smaller scale redevelopment and renewal of the existing high street frontage in order to improve the town centre's retail offer.

---

## Representation No: 603 / 8

Name :

Organisation : Asda Stores Ltd

Policy Policy DM11: Development principles for Barnet's town centres

Chapter:

Paragraph:

---

### Reason for Objecting or Supporting?:

We do not support the wording of draft policy DM09 which states:

'Significant new retail and other appropriate town centre use proposals outside the town centres or any expansion of existing out of centre sites will be refused [our emphasis].'

This wording is contrary to PPS4 which retains the flexibility to allow town centre uses in out-of-centre locations in appropriate circumstances. Specifically, if town centre or edge of centre sites are not available. The wording of policy DM09 should be amended to enable the same level of flexibility as set out in PPS4.

Paragraphs 4 to 6 of policy DM09 under the heading 'Primary and secondary frontages' are poorly worded and confusing. It is assumed the reference to 'table 10.1' should be a reference to 'table 7 – Targets for the percentage of frontages in town centres used for retail' which appears above policy DM09 on page 28 of the document.

We note that a minimum target of 65% retail use within secondary frontages is stipulated for New Barnet, despite the absence of any secondary frontages within New Barnet, as shown on Map 8 in Appendix 5.

Paragraph 6 of DM09 states that 'any significant new retail development will be expected to provide a mix of unit sizes...' The wording 'significant new retail development' is ambiguous and gives no guidance on what might be considered to be 'significant'. Further, the wording assumes that 'significant new retail development' must comprise a mix of units, which may not necessarily be the case.

Whilst we support the council's intention, set out in paragraph 10.9.1, to take a flexible approach to employment use within town centres, the relevant paragraphs 7 and 8 under the heading 'mixed use development' in DM09 are confusing, stating that 'the protection of employment floorspace should meet the requirements set out in DM09'. Given there is no reference in other parts of DM09 to employment floorspace it is unclear how much or in what manner the council seeks to protect employment floorspace within town centres, or if there is any intention to actively promote employment space in town centres.

Aside from the reference to refusal of out-of-centre town centre uses, we generally support the intent of draft policy DM09. However, the wording of policy DM09 is confusing and should be amended to clarify the council's intentions for the town centres. We support the equal treatment of all 14 of Barnet's district centres and one major town centre in this policy, rather than the approach taken in policy CS6 of the draft Core Strategy Publication Stage, which favours some of the district centres over others.

---

### If you are Objecting, what changes are you seeking?:

---

**Council's response :**

The policy and supporting text have been amended to include full reference to the tests in PPS4.

The approach to retail frontages has been clarified following the evidence provided in the Background Report: District Centre Frontages which sets out the results of the latest town centre survey of the district centres in the borough.

Significant new development is identified as comprehensive retail development.

A cross reference to mixed use development in town centres has now been added in the employment policy DM12. Provided the loss of employment space can be justified loss will be permitted but in the town centres some replacement will be expected as well as delivering a mix of other uses including community as well as residential.

---

**Representation No: 603 / 9**

**Name :**

**Organisation :** Asda Stores Ltd

**Policy** Policy DM12: Maintaining our local centres and parades

**Chapter:**

**Paragraph:**

11.3.2

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**Reason for Objecting or Supporting?:**

The New Barnet District Centre is incorrectly identified at 11.3.2 as a Local Centre. This reference should be removed.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

Reference has been removed

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## Representation No: 604 / 1

Name : Mr Chris Thomas

Organisation : Outdoor Advertising Association (OAA)

Policy Policy DM01: Protecting Barnet's character and amenity

Chapter:

Paragraph:

3.4.8

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### Reason for Objecting or Supporting?:

The OAA consider that part of Policy DM02 and the final sentence in paragraph 3.4.8 of the supporting text are objectionable. The OAA consider that to assume blanket presumptions against all advertisements of a certain type is unduly restrictive, contrary to the advice in paragraph 17 of PPG19.

Evidence taken from Inspector's Reports at Local Plan Inquiries at Mendip and Wandsworth support the OAA's objections. In the Mendip case the Inspector concluded that a similarly restrictive policy being put forward by the Council was not justified. I quote from paragraph 4.182 of the Inspector's Report:

"There is also no need to make special mention of poster hoardings. They clearly fall within the normal meaning of advertisements (PPG19, 3) and, whilst they are the subject of specific guidance in the annex to PPG19, they are still subject to the same amenity and public safety tests contained in the Regulations as other outdoor advertising."

In the Wandsworth case the Inspector again dismissed the use of blanket policies that would restrict advertisements of certain types or locations. I quote from paragraph 3.145 below:

"The Regulations limit Council control of those advertisements which fall within their scope to the interests of amenity and public safety. There is, therefore, no support in them for a blanket policy to prevent advertisements near schools and playgrounds....It is clear that all applications should be considered on these two grounds on their own merits. For the same reason I cannot accept objection 319 which would not allow the number of hoarding sites to be increased."

It is therefore clear that the draft Development Management Policies DPD should not presume against all advertisements of a certain type in this way as they all fall within the normal definition of advertisements. Amenity and public safety are still the determining factors and therefore the policies should only presume against such advertisements in situations where their impact on amenity or public safety would be damaging. Certainly there are many advertisement hoardings within Barnet which are displayed with consent granted either by the Council or by the Planning Inspectorate on appeal. There is therefore also no factual justification for this proposed policy.

The OAA therefore consider that the sentence "Advertisement hoardings will not normally be permitted" in draft policy DM02 and the second sentence of paragraph 3.4.8 should be deleted in their entirety. The remaining first sentence of paragraph 3.4.8 is entirely adequate and appropriate for the control of all types of advertisement.

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### If you are Objecting, what changes are you seeking?:

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#### Council's response :

Reference to hoardings has been removed

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**Representation No: 605 / 2**

**Name :** Kate Kerrigan

**Organisation :** Consortium of Registered Providers (RPs), Home Group, One Housing Group and Origin Housing

**Policy** Policy DM02: Development standards

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

We accept the council's approach to ensure high quality design which makes a positive contribution to the borough. However, Affordable Housing has to meet with HCA standards, including Code for Sustainable Homes, and therefore the impact of any further requirements should be considered having regard to the viability and potential harm to the delivery of affordable housing.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The design and environmental standards do not exceed existing national and London Plan targets therefore viability on environmental grounds does not need to be considered in the DPD.

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**Representation No: 605 / 3**

**Name :** Kate Kerrigan

**Organisation :** Consortium of Registered Providers (RPs), Home Group, One Housing Group and Origin Housing

**Policy** Policy DM07: Protecting housing in Barnet

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

We agree with the general objective of protecting housing in Barnet. However, in some exceptional circumstances loss of housing in strict numerical terms may be justified. Examples are where there is remodelling to achieve a higher number of affordable housing units or where improved accommodation meets an identified need. Guidance should outline these exceptional circumstances, although each case will need to be treated on its own merits.

Also where the loss of housing accommodates higher standard dwellings this should also be taken into account as an exceptional circumstance to the general policy.

---

**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

Loss of housing is only acceptable in exceptional circumstances and these are set out. Net replacement of affordable housing is identified as acceptable in line with the London Plan and this has been added to the supporting text. Improvements to accommodation are not included as a suitable reason for an overall loss of housing in a scheme.

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**Representation No: 605 / 4**

**Name :** Kate Kerrigan

**Organisation :** Consortium of Registered Providers (RPs), Home Group, One Housing Group and Origin Housing

**Policy** Policy DM08: Ensuring a variety of sizes of new homes to meet housing need

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

We support the priority of 3 bedroom units for social housing. However, we do have reservations with regard to priority being placed on 4 bedroom units for intermediate housing, as it is our experience that they can be difficult to dispose of due to the insufficient upfront capital available to prospective tenants. Therefore, we feel that priority is better placed on 1, 2 and 3 bedroom units. We require further guidance on how this policy will be implemented.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

It is clearly stated that the house sizes are priorities and that this policy will be applied flexibly.

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**Representation No: 605 / 5**

**Name :** Kate Kerrigan

**Organisation :** Consortium of Registered Providers (RPs), Home Group, One Housing Group and Origin Housing

**Policy** Policy DM09: Specialist housing

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

We note the Councils approach to 'encourage proposals for, and seek to retain, HMO provided that they meet an identified need'. However, this policy should allow for the conversion/amalgamation of HMO accommodation where the resulting accommodation will either be affordable housing or where the resulting accommodation will be housing to be sold on the open market and the proceeds of sale will be re-invested in affordable housing by an RP.

We support the provision of housing proposals for older people; however these should not be restricted by the criteria set out in the policy. Each case should be considered on its own merit

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

Loss of HMO is resisted as they can provide an important source of low cost housing which can help to reduce the need for affordable housing. Because of this the provision of or funding of affordable housing will not be an exception where the loss of HMO is concerned. Any loss will be expected to demonstrate the absence of need.

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**Representation No: 605 / 6**

**Name :** Kate Kerrigan

**Organisation :** Consortium of Registered Providers (RPs), Home Group, One Housing Group and Origin Housing

**Policy** Policy DM10: Affordable housing contributions

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

We require further details on the 'flexible approach to affordable housing delivery' where the number of additional units is between 10 and 15 units. Whilst we understand the impact of viability on affordable housing provision, 30% on site provision should be the initial starting point with a reduction based on a viability assessment if justified.

We support that 'all new development providing 15 or more units will be required to achieve on-site, subject to viability, a minimum of 30% affordable housing'.

Financial contributions should be accepted exceptionally and only where they are ring fenced for new affordable housing or for bringing existing private properties back into use as affordable housing in pursuance of housing and planning objectives.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

All applications above 10 units will be required to demonstrate viability to ensure they provide the maximum amount of affordable housing. The 30% target is a minimum. Further detail will be provided in a revised Affordable Housing Supplementary Planning Document. The SPD will also provide further detail on payments in lieu but they are intended to be used only in exceptional circumstances.

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**Representation No: 605 / 7**

**Name :** Kate Kerrigan

**Organisation :** Consortium of Registered Providers (RPs), Home Group, One Housing Group and Origin Housing

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Policy for mixed uses should emphasise the importance of delivering affordable housing as part of mixed schemes. Affordable housing provision in town centres can contribute to vibrancy and vitality and the better public transport links found in centres are a particular benefit for residents of affordable housing who are less likely to own a car. Reference to this should be included within the policy.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

Reference to delivering affordable housing in town centres has been added to the supporting text.

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**Representation No: 605 / 8**

**Name :** Kate Kerrigan

**Organisation :** Consortium of Registered Providers (RPs), Home Group, One Housing Group and Origin Housing

**Policy** Policy DM13: Community and education space

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

We suggest that the provision of affordable housing should be an acceptable exceptional alternative use on community / educational use sites, particularly considering it too is a community benefit.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

PPS1 requires us to respect the diverse needs of communities. We need to provide for their needs and this includes a wide variety of community spaces. In planning terms affordable housing is not a community use and should not be treated as exceptional. Provided the loss of the community use can meet the policy requirements and demonstrate that community needs can be met then it can be replaced with affordable housing.

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**Representation No: 605 / 9**

**Name :** Kate Kerrigan

**Organisation :** Consortium of Registered Providers (RPs), Home Group, One Housing Group and Origin Housing

**Policy** Policy DM14: New and existing employment space

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

We suggest incorporating a policy which provides the exception that the loss of employment space and office will only be permitted where it will provide 100% affordable housing.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

Ensuring that adequate employment space is protected is important to meet requirements set out in PPS1 and PPS4 and also ensure that we meet a strong and prosperous Barnet.

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**Representation No: 605 / 10**

**Name :** Kate Kerrigan

**Organisation :** Consortium of Registered Providers (RPs), Home Group, One Housing Group and Origin Housing

**Policy** Policy DM15: Green Belt and open spaces

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Finding affordable land for affordable housing can prove difficult, given amongst other factors the relatively high price of land. Therefore we suggest that the Council considers identifying and targeting Greenfield sites for 100% affordable housing. Such a move could provide opportunities for RPs to provide 100% affordable housing with a mix of tenures. An imbalance in the housing mix of an area can undermine the long-term sustainability of a community, as businesses and services find it difficult to recruit and retain staff due to high housing costs, networks of family and social support are weakened as younger residents are forced to move away in order to find housing which they can afford and the environment and people's sense of well-being are affected by increasing traffic congestion, as long-distance commuting in and out of Barnet increases.

The loss of open space should also be considered where the provision of needed affordable housing, for example, outweighs the benefit of retaining the open land. This should be recognised in the policy as an exception.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

Barnet is delivering the housing numbers set out in the London Plan through the regeneration and development areas, town centres and other sites that make up the housing trajectory. The borough would have to demonstrate exceptional circumstances to identify green belt land given the policy position set out nationally in PPG2. This identifies the principal for designating green belt land is to prevent urban sprawl and maintain openness.

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**Representation No: 605 / 11**

**Name :** Kate Kerrigan

**Organisation :** Consortium of Registered Providers (RPs), Home Group, One Housing Group and Origin Housing

**Policy** Policy DM17: Travel impact and parking standards

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Car ownership levels are lower for housing association residents, in both shared ownership and social rented schemes. We suggest that there should be a policy which sets a maximum of 1 space per unit for RP schemes with the proviso that the level of parking proposed in any individual scheme by an RP will be accepted unless that provision would compromise highway safety.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The figures are not a minimum and the policy sets out the considerations which will need to be demonstrated if delivery is to be acceptable.

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**Representation No: 605 / 12****Name :** Kate Kerrigan**Organisation :** Consortium of Registered Providers (RPs), Home Group, One Housing Group and Origin Housing**Policy** Policy DM01: Protecting Barnet's character and amenity**Chapter:****Paragraph:**

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**Reason for Objecting or Supporting?:**

We note the council's view that the conversion of existing dwellings into flats can have a cumulative effect which can damage the quality of the environment. It goes on to state conversions in roads characterised by houses in single occupation will not normally be accepted.

However, the Council should take each conversion on a case by case basis, particularly where the conversion will provide much needed affordable housing. Considering the shortfall of affordable units in the borough, the council should not restrict the potential benefits of conversions to meeting housing need.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The conversions policy aims to protect streets which are characterised by unconverted dwellings. Protecting these dwellings helps to protect Barnet's residents' amenity and enhance Barnet as a successful London suburb.

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**Representation No: 605 / 12****Name :** Kate Kerrigan**Organisation :** Consortium of Registered Providers (RPs), Home Group, One Housing Group and Origin Housing**Policy** Policy DM01: Protecting Barnet's character and amenity**Chapter:****Paragraph:**

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**Reason for Objecting or Supporting?:**

We understand the importance of protecting the best aspects of the existing character of the borough and the Council's view on protecting and retaining garden space. However, we are concerned that insufficient attention has been paid to ensuring that an adequate supply of land for affordable housing will exist. Garden land has and should remain as a good supply for affordable housing. It should be remembered that whilst garden land is no longer classified as "previously developed", this does not mean that it is not suitable for development. Therefore this policy should not be applied inflexibly but each scheme should be considered on its own merits, and due weight should be attached especially where it can be shown to provide an important community benefit such as affordable housing. Given the range of constraints to development

across the borough, backland and infill sites provide one of the few opportunities for providing new affordable housing. Such is the need for affordable housing and such has been the relatively low level of delivery, that there is every need to improve the future supply.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

Each scheme will be considered on its own merits. Provided that development on back gardens is acceptable in relation to character and meets the garden amenity space standards then it will be permitted. There will be further consultation on the standards for garden amenity space which will be set out in the Sustainable Design and Construction SPD.

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**Representation No: 606 / 1**

**Name :** Helen Massey

**Organisation :** Barnet Residents Association

**Policy** Policy DM01: Protecting Barnet's character and amenity

**Chapter:**

**Paragraph:** 2.5.5

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**Reason for Objecting or Supporting?:**

We are very supportive about this restriction on conversions to flats in areas of predominantly family housing.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

This support is welcomed

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**Representation No: 606 / 2**

**Name :** Helen Massey

**Organisation :** Barnet Residents Association

**Policy** Policy DM01: Protecting Barnet's character and amenity

**Chapter:**

**Paragraph:** 2.5.6

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**Reason for Objecting or Supporting?:**

Superficially this also sounds very positive - but is it only going to apply in Conservation Areas? A key concern here is how you might enforce it. At the moment traders often refit shop fronts without bothering to seek permission whether they are in a Conservation Area or not.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

Unauthorised changes to shop fronts are at risk of enforcement.

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**Representation No: 606 / 3**

**Name :** Helen Massey

**Organisation :** Barnet Residents Association

**Policy** Policy DM09: Specialist housing

**Chapter:**

**Paragraph:** 8.5.3

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**Reason for Objecting or Supporting?:**

We are very disappointed with this idea. Older residents subdividing much needed family houses is a longer term loss and should be resisted.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

This text has been removed

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**Representation No: 606 / 4**

**Name :** Helen Massey

**Organisation :** Barnet Residents Association

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:** 10.2.1

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**Reason for Objecting or Supporting?:**

This summary of previous concerns expressed seems to lose the principle that parking might be zoned according to the type of driver at which it is aimed. That is short term shopper parking in town centres and local commuters on the fringes of the town so that they do not occupy shopper spaces or add to congestion at peak times.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

The summary was not intended to cover all responses made as part of previous consultation.

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**Representation No: 606 / 5**

**Name :** Helen Massey

**Organisation :** Barnet Residents Association

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:** 11.3

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**Reason for Objecting or Supporting?:**

Maintaining active frontages is very positive as is the requirement for vacant A1 premises to have been effectively marketed before change of use is allowed. Could the same requirement not be placed on A4 pubs as these are closing in numbers (3 in High Barnet in the last five years). Some are simply closing and selling up and others are reinventing themselves as restaurants. This might seem not a lot different, but they are quite different social scenes. People go to a restaurant and socialise with the people they went there with; people go to a pub and meet others to socialise on a more casual basis.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

A policy to protect pubs may not be workable and has not been included. A pub is classed as A4 and is permitted to change to a higher use class such as a shop without planning permission under permitted development rights.

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**Representation No: 606 / 6**

**Name :** Helen Massey

**Organisation :** Barnet Residents Association

**Policy** Policy DM01: Protecting Barnet's character and amenity

**Chapter:**

**Paragraph:** 2.4.1.

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**Reason for Objecting or Supporting?:**

Paragraph 2.4.1 of the DMP states that "The biggest threat to preserving Barnet's local character is the loss of existing vegetation, most commonly because of the conversion of front gardens to parking for cars". That recognition is good news but you then go on to say that there is nothing you can do about it. "The Council cannot prevent residents exercising their nationally granted rights through permitted development to make minor alterations to their front and back gardens....." That is simply misleading. The key issue is not permitted development rights. If residents want concrete front gardens they sadly have the right to do that. Realistically in almost all cases the reason why gardens are paved over is to park vehicles and the devastation of our streetscape is down to the number of crossovers allowed, without which residents would not choose to concrete their gardens. Barnet has been at the forefront of London Councils allowing crossovers. The London Assembly document "Crazy Paving: The Environmental Importance of London's Front Gardens (September 2005) quotes Barnet as having allowed 2341 crossovers between 2000 and 2005 i.e. 85% of applications. In 2007 Barnet made crossovers easier by removing the required minimum depth of 4.8 metres. Thus roads with even very shallow front gardens are achieving crossovers. We believe that only one other London Council does not specify a minimum depth. To bring this argument back to the Core Strategy the issue to address to preserve our streetscape before further damage is done is noting to do with permitted development and everything to do with refusing applications for crossovers.

It can be done. Although the Highways Act 1980 provides for any person to apply for a "vehicle crossing over a footway or verge" and for the application to be determined in accordance with subsection 5 (which only covers safe access and egress to the relevant hardstanding and the safe passage of vehicular traffic on highways) the provisions of that Act are amended by subsequent case law, specifically the judgement on 19.7.2000 in Case NO. CO/733/2000. This judgement enables Councils to take into account issues other than the pure safety issues that the language of subsections (5) and (11) is such that they (Royal Borough of Kensington and Chelsea) were prohibited from having regards to matters other than those specified in subsection (5). "Since the judgement other boroughs have taken a far more robust approach to crossovers and we believe LB Barnet should do likewise.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

Further explanation has been provided on the permitted development rights of homeowners and converting their front gardens. It does not provide further control.

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**Representation No: 607 / 1**

**Name :** Mr Patrick Blake

**Organisation :** Highways Agency

**Policy** Policy DM11: Development principles for Barnet's town centres

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The HA strongly supports Policy DM9, particularly the aspiration to refuse town centre type developments that are proposed outside of town centres. Town centre locations are better served by public transport links and will ensure that new development benefits from an enhanced level of accessibility. This would also help ensure that the Strategy is in line with PPG13 paragraph 20.

In addition the HA welcomes proposals in Policy DM09 to increase the provision of mixed use development within the Borough. Provision of mixed use development can help to reduce need to travel, in line with PPG13. We particularly welcome mixed use developments directed towards areas with good access to public transport, particularly in instances where development is likely to be travel intensive. This approach would help to reduce dependence on the private car, and would be in line with the recommendations of paragraph 30 of PPG13.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

We welcome this support. The policy has been revised to clarify that it will apply the sequential approach and impact test as set out in PPS4. Wherever possible we will protect the vitality and viability of the town centres in Barnet. Encouraging mixed use development helps to ensure this.

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**Representation No: 607 / 2**

**Name :** Mr Patrick Blake

**Organisation :** Highways Agency

**Policy** Policy DM14: New and existing employment space

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The HA welcomes Policy DM12, in particular the provision of mixed use development to replace the loss of office sites.

Refer to response to DM09 also below:-

In addition the HA welcomes proposals in Policy DM09 to increase the provision of mixed use development within the Borough. Provision of mixed use development can help to reduce need to travel, in line with PPG13. We particularly welcome mixed use developments directed towards areas with good access to public transport, particularly in instances where development is likely to be travel intensive. This approach would help to reduce dependence on the private car, and would be in line with the recommendations of paragraph 30 of PPG13.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

We welcome this support

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**Representation No: 607 / 3**

**Name :** Mr Patrick Blake

**Organisation :** Highways Agency

**Policy** Policy DM15: Green Belt and open spaces

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

Policy DM13 comments that limited extensions in Green Belts may be acceptable where they do not result in a disproportionate addition over and above the size of the existing building or an over intensification of use of the site. While the HA does not object to this policy we would be very concerned with development in areas where there is limited access to sustainable transport modes and therefore result in higher levels of car usage and subsequent potential impact on the SRN. We therefore suggest that redevelopments are permitted only in exceptional circumstances where there is no detrimental effect on the highway network.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

Limited extensions to houses will only be permitted in the green belt in exceptional circumstances. Transport Assessments will be required in line with the criteria set out in Department for Transport guidance.

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**Representation No: 607 / 4**

**Name :** Mr Patrick Blake

**Organisation :** Highways Agency

**Policy** Policy DM17: Travel impact and parking standards

**Chapter:**

**Paragraph:**

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**Reason for Objecting or Supporting?:**

The HA strongly supports the requirement for Travel Plans and Transport Impact Assessments to accompany developments to reduce demand for travel by car. PPG13 states that the availability of car parking has a major influence on the means of transport people choose for their journeys. As such increasing the level of parking provision in residential developments could be detrimental to the potential benefits of the proposed travel plans without careful management.

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**If you are Objecting, what changes are you seeking?:**

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**Council's response :**

Thank you for the support for the requirement for Travel Plans and Transport Assessments.

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