

Barnet Draft Local Plan Regulation 22 Consultation Statement November 2021

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1 Introduction

1.1.1 This Consultation Statement sets out what consultation and engagement has been undertaken on Barnet's draft Local Plan and how this has shaped the revision of the document. This Statement has been submitted alongside the draft Local Plan to the Secretary of State as part of the supporting documents required under Regulation 22 of the Local Plan Regulations.

1.1.2 The following engagement and consultation processes have taken place in the formulation of Barnet's draft Local Plan:

- In late 2017, the Council conducted a series of interactive workshops with key stakeholders entitled "Planning for the Future of Barnet" from September 2017-December 2017 (Appendix A).
- In early 2020, the Council consulted on the Regulation 18 Local Plan Preferred Approach (27th January 2020 to 16th March 2020).
- In mid 2021, the Council consulted on the Regulation 19 Local Plan Publication (28th June 2021 to 9th August 2021).

1.1.3 This Consultation Statement sets out details on the Regulation 18 and the Regulation 19 consultations undertaken. Both consultations were in accordance with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulations 18 and 19).

1.1.4 Consultation on Regulation 18 was carried out in accordance with Barnet's Statement of Community Involvement (SCI) approved in 2018. Consultation on Regulation 19 was carried out in accordance with the SCI – COVID19 Addendum approved in September 2020.

1.2 Statutory requirements

1.2.1 The purpose of this Statement is to set out how the Council has carried out engagement with local residents, community organisations, voluntary bodies, businesses and other organisations in the preparation of the draft Local Plan.

1.2.2 The production of this Statement is a requirement set out by the Town and Country Planning (Local Planning) (England) Regulations 2012 and, accompanying the Regulation 19 submission Local Plan, must set out:

- (i) which bodies and persons were invited to make representations under regulation 18,
- (ii) how those bodies and persons were invited to make such representations,
- (iii) a summary of the main issues raised by those representations, and
- (iv) how the main issues have been addressed in the local plan.

- 1.2.3 All consultation and engagement activities have been carried out within the context of paragraph 16 (c) of the National Planning Policy Framework (NPPF) which states that plans should:
“be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees”
- 1.2.4 In summary, the Council formally consulted for seven weeks in accordance with Regulation 18 and six weeks in accordance with Regulation 19. Both consultations provided a range of opportunities for the community and other stakeholders to comment on the emerging draft Local Plan.
- 1.2.5 Engagement activities for Regulation 18 focused on face to face events. This included six public engagement events with additional presentations to scheduled meetings of groups and forums. Consultation generated in excess of 2,000 representations from 150 individual representors. In addition, 300 anonymous responses were submitted through online questionnaires.
- 1.2.6 Engagement activities for Regulation 19 provided the opportunity for interested parties and statutory consultees to respond on the soundness and legality of the Local Plan helping to frame scrutiny of the document at the Examination in Public stage. Regulation 19 consultation was affected by the impact of COVID19 and engagement events were held online. Engagement included three online events led by an independent facilitator who helped to focus feedback on the soundness of the Local Plan. The online facilitated events were promoted extensively through social media. In addition, presentations on the Regulation 19 Local Plan were made to scheduled meetings of groups and forums.
- 1.2.7 The Council’s Engage Barnet platform was also used as an engagement tool to help explain how to get involved at the more focused Regulation 19 stage consultation. Both consultations were supported by a summary and FAQ document (Appendix B). A new animated video explaining the Local Plan was also produced as part of the Regulation 19 publicity.
<https://www.youtube.com/watch?v=2hBkOINHnDc>
- 1.2.8 Consultation on the Regulation 19 draft Local Plan generated 150 individual representors with around 800 representations made across all aspects of the draft Plan. Representations at Regulation 19 stage provided representors with the opportunity to request participation in the EIP hearing sessions.
- 1.3 Conformity with Barnet’s Statement of Community Involvement (SCI) and Barnet’s Consultation and Engagement Strategy**

- 1.3.1 The SCI guides the approach to consultation stages throughout the preparation of the Local Plan. It sets out how the community should be engaged in the Local Plan process and at what stages that involvement should take place. The current SCI for Barnet was adopted by the Council (as the local planning authority) in October 2018 and can be viewed at - https://www.barnet.gov.uk/sites/default/files/sci_2018.pdf.
- 1.3.2 An addendum to the SCI was adopted in September 2020, in response to the COVID-19 pandemic. The Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020 made temporary changes to how documents are made available under Regulation 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Regulations temporarily removed the requirement on a local planning authority to make documents available for public inspection at the authority's principal office and at such other places as the authority considers appropriate. They also made temporary changes to Regulation 36 of the 2012 Regulations to remove the requirement on a local planning authority to provide hard copies of documents made available under Regulation 35. The Addendum to Barnet's SCI extended these temporary changes for a longer period until it is safe, with the advice of the Council's Director of Public Health, to resume consultation processes as set out in the SCI. The SCI Addendum clarifies how the Council will engage with the community and continue to ensure that planning processes in Barnet remain fair, transparent and inclusive, while complying with Government guidance on the pandemic. [addendum_to_barnets_statement_of_community_involvement_sci_2018.pdf](#)
- 1.3.3 Barnet's Consultation and Engagement Strategy can be viewed at <https://engage.barnet.gov.uk/1116/documents/1152>. This seeks to build upon processes already in place across the Council. It aims to provide a framework for co-ordinating consultation and engagement and embed best practice to maximise the benefits of engagement for all stakeholders.
- 1.3.4 Both the SCI and the Consultation and Engagement Strategy documents highlight that consultation and public participation is a valuable part of policy development. Early discussions with statutory consultees, as well as continued engagement with other stakeholders has been undertaken by the Council in accordance with both of these documents.

2 Consultation on Barnet's Preferred Approach Local Plan (Regulation 18)

2.1 Consultation Documents

2.1.1 The Preferred Approach Local Plan was accompanied by a suite of documents that forms the Local Plan Evidence Base. Table 1 sets out documents that were published as part of the consultation. All of the information that was published remains available on the Council's website at: <https://www.barnet.gov.uk/planning-and-building/planning-policies-and-local-plan/local-plan-review/local-plan-evidence-and>

Table 1: Documents that were published in January 2020 as part of the Local Plan Review Regulation 18 Consultation

Documents published	Source
Site Selection Background Paper	Barnet Council
Barnet Regulation 18 Duty to Cooperate	Barnet Council
Integrated Impact Assessment (IIA) Report 1	Barnet Council
IIA Report 2	Barnet Council
IIA Report 3	Barnet Council
Changes to Policies Map	Barnet Council
Key Facts Evidence Paper	Barnet Council
Draft Local Plan FAQs	Barnet Council
Open Space Strategy	Barnet Council
Demographic Information	
Barnet's Authorities Monitoring Report	Barnet Council
GLA Strategic Housing Land Availability Assessment	GLA
GLA Town Centre Health Checks	GLA
Evidence	
Barnet Hot Food Takeaways Review	Barnet Council
Public House Review	Barnet Council
Barnet Shisha Bar Report	Barnet Council
Gypsy Traveller and Travelling Show People Accommodation Assessment	Opinion Research Services
Strategic Housing Market Assessment	Opinion Research Services
Employment Land Review	Ramidus
Town Centre Floor Needs Assessment	Peter Brett Associates
Indoor Sports and Recreation Study	Strategic Leisure Limited and 4 global
Strategic Flood Risk Assessment Level 1	METIS

Barnet IIA Scoping Report	Re
Barnet Car Parking Study	Capita
Barnet Greenbelt and Metropolitan Open Land Study	LUC
Residential Conversions Study	Re
Tall Buildings update	Re

2.1.2 The Regulation 18 draft Local Plan and accompanying documents were available to view at:

- Planning reception at 2 Bristol Avenue, Colindale, London NW9 4EW. (Monday, Wednesday and Friday, 9am– 1pm)
- local libraries (details and opening hours available at <https://www.barnet.gov.uk/libraries/library-opening-times>)
- online at <https://engage.barnet.gov.uk/Draft-Local-Plan-Consultation>

2.1.3 Part 2 of the Town and Country Planning (Local Plan) (England) Regulations 2012 specifies that the following bodies must be consulted in accordance with Section 33a of the Planning and Compulsory Purchase Act 2004 in the preparation of Local Plans.

- Mayor of London
- Adjoining Local Planning Authorities
- Environment Agency
- Historic Buildings and Monuments Commission for England (known as Historic England)
- Homes England
- Natural England
- Clinical Commissioning Group
- Transport for London
- London Enterprise Partnership
- National Highways
- Relevant sewerage and water undertakers e.g. Thames Water
- Relevant telecommunications companies
- Relevant gas and electricity companies Network Rail

2.1.4 Other stakeholders include:

- Age UK
- Barnet Partnership Board
- British Geological Survey
- British Waterways
- Centre for Ecology and Hydrology
- Chamber of Commerce, Local CBI and local branches of Institute of Directors
- Church Commissioners
- Civil Aviation Authority
- Coal Authority
- Commission for Racial Equality

- Crown Estate Office
- Diocese Board of Finance
- Disabled Persons Transport Advisory Committee
- Environmental Groups at national, regional and local level, including
 - Council for the Protection of Rural England
 - Friends of the Earth Royal
 - Society for the Protection of Birds
 - London Wildlife Trust
- Local Historic, environmental and amenity groups and societies, including Conservation Area Advisory Committees (CAACs)
- Equality and Human Rights Commission
- Fields in Trust Freight Transport Association
- Gypsy Council
- Health and Safety Executive
- Homes and Communities Agency
- Home Builders Federation
- Learning and Skills Council
- Royal Mail Property Holdings
- Registered Providers
- Sport England
- Friends, Families and Travellers (FFT)
- Women’s National Commission
- The Theatres Trust
- Middlesex University
- Barnet College
- Metropolitan Police
- Town Teams

2.2 How stakeholders were consulted

2.2.1 Consultation was promoted through a wide variety of methods as shown in Table 3.

2.2.2 The Council maintains a Local Plan database of organisations and people who have expressed an interest in the Local Plan. This database is live and continuously updated in accordance with GDPR requirements. There are currently 2,500 individuals and/or organisations on the database.

Table 3: Main consultation and engagement methods - Regulation 18

Method	
Engage Barnet website (https://engage.barnet.gov.uk/Draft-Local-Plan-Consultation) and linked via the Planning policy pages	Information and relevant Local Plan documentation was uploaded on to the Barnet Engage website.

	Notification on the 'Planning Policy - Local Plan review' webpage of the council's website.
Emails and letters	<p>Over 23,000 letters and emails sent out to:</p> <ul style="list-style-type: none"> • those registered on the policy consultation database including statutory consultation bodies • local businesses • the voluntary and community sector • neighbourhood plans forums • Residents Associations • Statutory consultation database • landowners (including people with a leasehold interest in sites); and • Residents/businesses who are in close proximity to the proposed sites (considered to be within 100 metres) <p>Copies of these letters are available to view in Appendix C</p>
Public notice	A public notice was published in the Hendon and Barnet Times. A copy of this notice dated 30 th January 2020 can be found in Appendix D.
Press Release – Barnet residents and businesses to provide views on the Council's plans for the Borough up to 2036.	<p>A press release was issued on 10th February 2020.</p> <p>https://www.barnet.gov.uk/news/barnet-residents-and-businesses-provide-views-councils-plans-borough-2036</p> <p>In addition, 20,000 fortnightly Barnet First E-Newsletter emails were sent out.</p>
Social media	A targeted social media campaign was carried out using Facebook, Twitter, Instagram and a news banner on Barnet's website, rolling news on Council's webpage throughout the seven weeks' consultation period and over Twitter.
Community events / meetings	Over 25 community meetings / events took place across the Borough through the duration of the consultation period. These events are set out in Appendix E, attended by planning policy officers responsible for drafting the plan, targeted all sections of the population.
Targeted consultation events	<p>Three boroughwide events on the draft Local Plan and particularly covering all proposed site allocations took place at:</p> <ul style="list-style-type: none"> • St. Paul's Finchley, N3 2PU (Wednesday 5th February 6.30-

	<p>8.00pm) –sites from wards of Childs Hill, East Finchley, Finchley Church End, Garden Suburb, Golders Green, West Finchley and Woodhouse</p> <ul style="list-style-type: none"> • Colindale Offices, NW9 4EW (Monday 10th February 6.30-8.00pm) – sites from wards of Burnt Oak, Colindale, Edgware, Hale, Hendon, Mill Hill and West Hendon • Barnet House, N20 0EJ (Tuesday 11th February 6.30-8.00pm) – sites from wards of Brunswick Park, Coppetts, East Barnet, High Barnet, Oakleigh, Totteridge and Underhill. <p>The Planning Policy Team also presented the draft Local Plan at all three Resident’s Forum meetings all held on 4th March 2020 7.00-10.00pm:</p> <ul style="list-style-type: none"> • Chipping Barnet Residents Forum – (Chipping Barnet Library) • Finchley and Golders Green Residents Forum – (Church End Library) • Hendon Residents Forum – (Hendon Town Hall).
Online questionnaire	Consultees were able to provide feedback to the Council through an online questionnaire. A copy of this is included in Appendix F.

2.3 Regulation 18 Draft Local Plan consultation - feedback and questionnaire

2.3.1 Feedback from stakeholders was sought through a number of methods. Comments were submitted:

- online via the Barnet Engage website <https://engage.barnet.gov.uk/Draft-Local-Plan-Consultation>;
- in writing via Planning Policy Team, 7th Floor, 2 Bristol Avenue, Colindale, London, NW9 4EW; or
- by email to forward.planning@barnet.gov.uk

2.3.2 In excess of 2,000 representations were received from 450 individuals through email, letter and questionnaire a breakdown of representation is provided below.

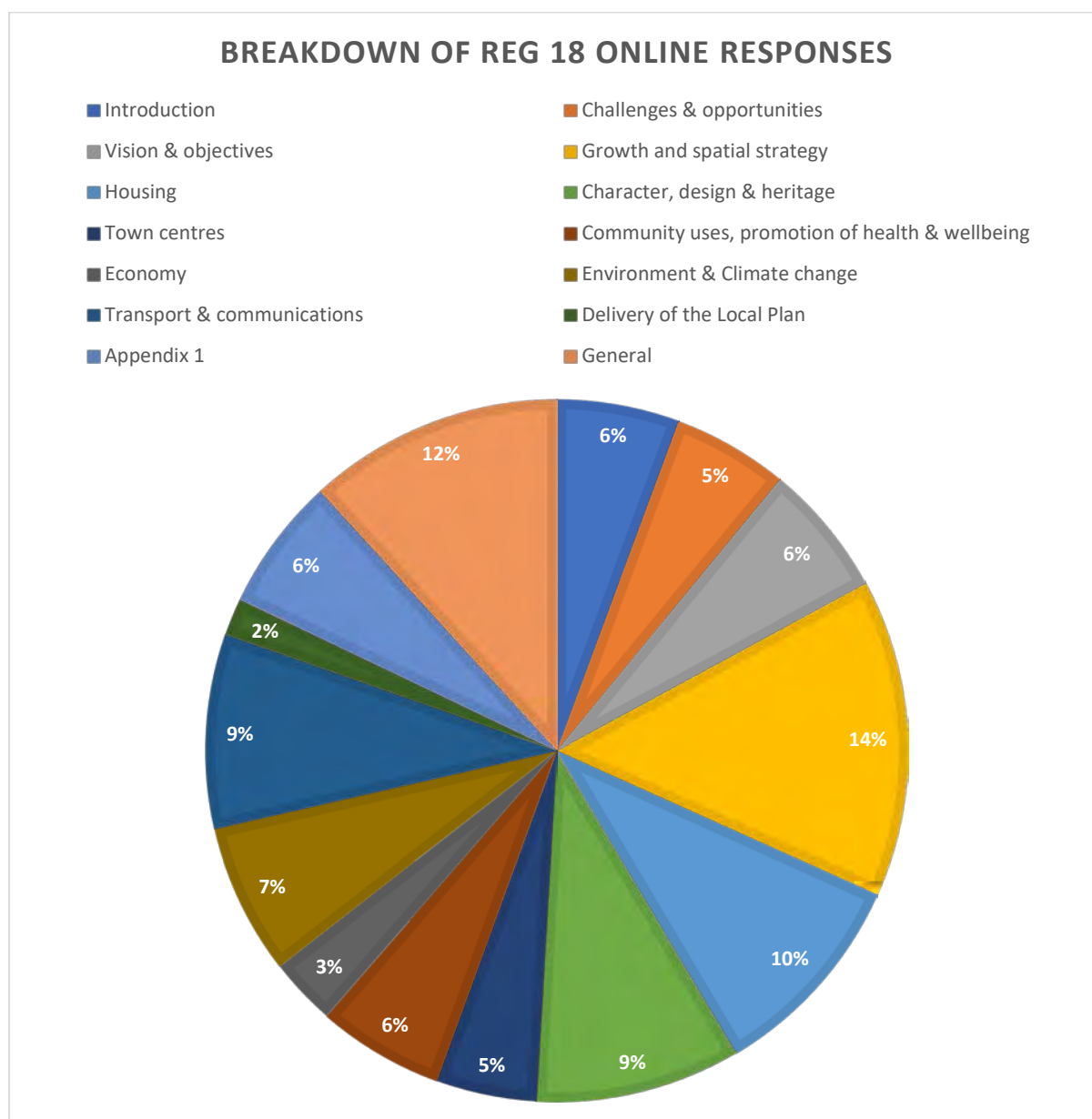
Table 4: Breakdown of Regulation 18 consultation responses

Method	Total representations
Online questionnaire	300
Email and Letter	150

2.4 Analysis/ Breakdown of online questionnaire responses.

2.4.1 Around 300 responses were received via the online questionnaire. The main questionnaire contained 36 questions (see Appendix F), with 18 additional questions on the profile of people responding.

Figure 1: Summary of responses from online questionnaire.



2.4.2 A summary of the consultation responses is outlined in Appendix G.

3 Consultation on Barnet’s Draft Local Plan (Regulation 19)

3.1.1 The Regulation 19 Draft Local Plan was accompanied by a suite of documents that forms the Local Plan Evidence Base. Table 5 sets out documents that were additional to those published at Regulation 18 (and still available) as part of the consultation. All of the information that was published is available on the Council’s website at: <https://www.barnet.gov.uk/planning-and-building/planning-policies-and-local-plan/local-plan-review/local-plan-evidence-and>

Table 5: Additional Documents that were published in June 2021 as part of the Local Plan Review Regulation 19 Consultation

Documents published	Source
Barnet Local Plan Viability Assessment	BNP Paribas
Draft Local Plan Reg 18 Consultation Statement	Barnet Council
Schedule of Representation and Responses Regulation 18 Local Plan	Barnet Council
Infrastructure Delivery Plan (IDP)	Barnet Council
Duty to Cooperate Statement Regulation 19	Barnet Council
Changes to Policies Map (Regulation 19)	Barnet Council
Draft Local Plan Regulation 19 FAQs	Barnet Council
Strategic Transport Assessment	Capita
WLA Affordable Workspace Study	00 and Avison Young
Strategic Flood Risk Assessment – Level 2	Metis
Car Parking Standards Review	Capita
Update on Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA)	Barnet Council

3.1.2 Due to COVID19 restrictions the Planning Reception at the Council Offices in Colindale was not open so it was not used as a deposit location for the Regulation 19 consultation. Physical copies of the Regulation 19 draft and accompanying documents were made available at Barnet Libraries. All information was available online at <https://engage.barnet.gov.uk/local-plan-reg-19>.

3.1.3 Part 2 of the Town and Country Planning (Local Plan) (England) Regulations 2012 specifies that the following bodies must be consulted in accordance with Section 33a of the Planning and Compulsory Purchase Act 2004 in the preparation of Local Plans.

- Mayor of London
- Adjoining Local Planning Authorities
- Environment Agency
- Historic Buildings and Monuments Commission for England (known as Historic England)

- Homes England
- Natural England
- Clinical Commissioning Group
- Transport for London
- London Enterprise Partnership
- National Highways
- Relevant sewerage and water undertakers e.g. Thames Water
- Relevant telecommunications companies
- Relevant gas and electricity companies Network Rail

3.1.4 Other stakeholders include:

- Age UK
- Barnet Partnership Board
- British Geological Survey
- British Waterways
- Centre for Ecology and Hydrology
- Chamber of Commerce, Local CBI and local branches of Institute of Directors
- Church Commissioners
- Civil Aviation Authority
- Coal Authority
- Commission for Racial Equality
- Crown Estate Office
- Diocese Board of Finance
- Disabled Persons Transport Advisory Committee
- Environmental Groups at national, regional and local level, including
 - Council for the Protection of Rural England
 - Friends of the Earth
 - Royal Society for the Protection of Birds
 - London Wildlife Trust
- Local historic, environmental and amenity groups and societies, including Conservation Area Advisory Committees (CAACs)
- Equality and Human Rights Commission
- Fields in Trust Freight Transport Association
- Gypsy Council
- Health and Safety Executive
- Homes and Communities Agency
- Home Builders Federation
- Learning and Skills Council
- Royal Mail Property Holdings
- Registered Providers
- Sport England
- Friends, Families and Travellers (FFT)
- Women's National Commission
- The Theatres Trust
- Middlesex University
- Barnet College

- Metropolitan Police
- Town Teams

3.2 How stakeholders were consulted

3.2.1 Consultation was promoted through a wide variety of methods as shown in Table 6.

3.2.2 The Council maintains a Local Plan database of organisations and people who have expressed an interest in the Local Plan. This database is live and continuously updated in accordance with GDPR requirements. There are currently 2,500 individuals and/or organisations on the database.

Table 6: Main consultation and engagement methods Reg 19

Method	
Engage Barnet website (https://engage.barnet.gov.uk/local-plan-reg-19) and linked via the Planning policy pages	Information and relevant Local Plan documentation was uploaded on to the Barnet Engage website. Notification on the 'Planning Policy - Local Plan review' webpage of the council's website.
Emails and letters	Over 18,000 letters and emails sent out to: <ul style="list-style-type: none"> • those registered on the policy consultation database including statutory consultation bodies; • local businesses • the voluntary and community sector • neighbourhood plans forums • Residents Associations • Statutory consultation database • landowners (including people with a leasehold interest in sites); and • Residents/businesses who are in close proximity to the proposed sites (considered to be within 100 metres) Copies of these letters are available to view in Appendix C.
Public notice	A public notice was published in the Hendon and Barnet Times. A copy of this notice dated 1 st July 2021 can be found in Appendix D.
Press Release – Help Shape the Future of Barnet	A press release was issued on July 2 nd 2021. https://www.barnet.gov.uk/news/help-shape-future-barnet

	In addition, 20,000 fortnightly Barnet First E-Newsletter emails were sent out.
Social media	A targeted social media campaign was carried out using Facebook, Twitter, Instagram and a news banner on Barnet's website, rolling news on Council's webpage throughout the six weeks consultation period and over Twitter.
Promotional Video – Local Plan review – Help Shape the Future of Barnet	An animated video explaining the Local Plan was also produced as part of the Regulation 19 publicity. This was launched on the Council's YouTube channel on July 6 th 2021. https://www.youtube.com/watch?v=2hBkOINHnDc
Community events / meetings	Online events to promote the draft Local Plan and explain the Regulation 19 process took place with Federation of Residents Associations in Barnet and Barnet Youth Board. Further details are set out at Appendix H.
Engagement sessions led by independent facilitator	<p>Three online facilitated engagement events were held on the draft Local Plan:</p> <ul style="list-style-type: none"> • Thursday 8 July between 6pm and 7.30pm • Wednesday 21 July between 6pm and 7.30pm • Thursday 5 August between 6pm and 7.30pm <p>Further details on these events are set out at Appendix H.</p>

3.3 Regulation 19 Draft Local Plan consultation - feedback

3.3.1 Regulation 19 consultation is a more formal consultation. Representations are required to focus on the 'soundness of the plan' as set out in NPPF (para 35). To be found sound the Local Plan has to be positively prepared, justified, effective and consistent with national policy. Consultees were therefore encouraged to respond using Forms A and B (Appendix I). Although responses received either via email or letter were also accepted.

3.3.2 Comments were submitted:

- in writing via Planning Policy Team, 7th Floor, 2 Bristol Avenue, Colindale, London, NW9 4EW; or
- by email to forward.planning@barnet.gov.uk

3.3.6 Approximately 800 representations from nearly 150 individual representors were received from a wide range of interested parties including statutory agencies, neighbouring boroughs, developers, landowners, community groups, resident's associations and individuals. A summary of the main issues raised through Regulation 19 in responses, and views expressed in relation to soundness, legal compliance or the duty to cooperate when preparing the Local Plan is set out at Appendix J.

Table 7: Breakdown of Regulation 19 consultation responses

Method	Total number of representators
Forms A & B	83
Email and Letter	62

Appendix A – Summary of comments received from “Planning for the Future of Barnet”, September 2017 -December 2017

3.4 Planning for the Future of Barnet 2017 Community Workshops

- 3.4.1 In providing the opportunity for residents, community groups, businesses and other stakeholders to have their say on planning for the future of Barnet a session of member, officer and community workshops took place between September and December 2017.
- 3.4.2 These workshops sessions, led by an independent facilitator, were interactive and innovative using a variety of creative methods to draw feedback from participants. The objective of the meetings was to encourage everyone to put forward their views on the issues facing Barnet and the options that should be pursued to address them. This would help to shape the vision for the Borough

3.5 Workshop Sessions

- 3.5.1 The following facilitator led sessions took place over 3 months in 2017
- Members – Sept 2017 at Hendon Town Hall
 - Chief Officers – Oct 2017 at North Business Park
 - Community – Dec 2017 at North London Business Park
- 3.5.2 These interactive and innovative events attracted attendance by over 100 people who agreed to participate in a 2 hour event exploring a range of issues facing Barnet and it's residents in the future but also providing a positive picture of Barnet in the present, highlighting why this Borough is somewhere they have chosen to live. A range of visual materials were utilised for context and a musical backdrop through a town planning playlist was provided for the community workshop.

3.6 Workshop Participants

- 3.6.1 Community representatives included:
- Barnet Society
 - Barnet Residents Association
 - Federation of Residents Associations in Barnet
 - Ramblers Association
 - Mill Hill Neighbourhood Forum
 - West Finchley Neighbourhood Forum
 - New Barnet Resident's Association
 - Finchley Society

3.7 Aims of these workshops

- Set vision and direction to provide guidance on key political choices
- Enable more qualitative and focused engagement with a wider group of members and stakeholders
- Inform development of future policies to meet vision

3.8 Desired Outputs

- Develop a creative and engaging process with stakeholders around a themed structure looking at housing, suburban streets, Barnet's character, town centres, and the local economy. Physical, green and social infrastructure served as an overlapping theme
- Provide a setting in which to set out the challenges ahead and the vision for the Local Plan
- Share innovative engagement and facilitation skills in supporting planners in producing the Local Plan

3.9 Feedback from all groups

3.9.1 The facilitator led workshop sessions started with essential context setting.

1. Growth and Spatial Strategy – Place Shaping & Place Making
2. Meeting Housing Needs and Aspirations
3. Community Health and Wellbeing
4. Town Centres and Economy
5. Protecting and Enhancing Character
6. Environment and Climate Change
7. Transport and Communication
8. Delivering the Local Plan

3.9.2 There was wide ranging discussion about the future shape of the Borough and how we manage change. General comments about planning and concerns about specific sites were raised as well as the views expressed on the themes.

3.10 Theme 1: Growth and Spatial Strategy – Place Shaping & Place Making

- Good design required for buildings of increasing height with 6-8 storeys as maximum heights in appropriate locations
- Higher densities supported in town centres. Low density considered inefficient
- Need to optimise density & scale of development whilst creating a place. Deliver in terms of streets & squares
- Support active design of public realm. Make Barnet's urban environment more green
- Need to spread growth more fairly. Cannot rely on regenerating social housing estates
- Opportunities for new development including along major thoroughfares, TfL sites and car parks
- Need to link growth with Arts & Culture

3.11 Theme 2: Meeting Housing Needs and Aspirations

- Plan for mixed communities with provision for families & older people and a mix of accommodation types and tenure
- Need genuinely affordable housing to ensure people stay in Barnet and future generations are not priced out
- Need for small family homes with gardens
- Need to make choice of housing more accessible across Barnet
- Support for Green Belt release if it delivers family homes

3.12 Theme 3: Community health and wellbeing

- Recognise that town centres are also social centres & important places for community and leisure activities
- More provision for leisure supported within public open spaces and town centres
- Need to be more flexible about content of town centres
- Need to plan for childcare facilities in town centres and at transport hubs
- Need to better protect public houses

3.13 Theme 4: Town Centres and Economy

- Respond to changing nature of entertainment, leisure, the evening economy & impact of online shopping
- Linear nature of Barnet's town centres is a challenge.
- Opportunity for a more zoning approach like the North Finchley SPD which is seen as the template for town centre revitalisation
- Support for market squares within town centres
- Plan for high streets to be proportionate to the areas they serve – support for ground floor retail with residential above
- Town centre intensification not just about new homes
- Need to improve connectivity of town centres. Recognise there is less car usage & that more people living & accessing town centre by foot or cycle
- Need to better manage the loss of Barnet's office stock to residential and support the remaining centres for manufacturing & innovation
- Need to better recognise contribution of the Arts Depot
- Need to manage spread of betting shops & charity shops

3.14 Theme 5: Protecting and Enhancing Character

- Support high quality buildings with a mix of height & uses appropriate to context
- Need to care for the areas of Barnet outside conservation areas
- Need to protect local green spaces, recognising their value especially in the more urban parts of Barnet
- Need to protect front and back gardens
- Recognition that basement development can have less negative impact on character than other types of extensions

3.15 Theme 6: Environment and Climate Change

- Support for protection & increased access to Green Belt but need to recognise that some of it is low quality
- Green Infrastructure – need to use rivers and natural features better. Opportunities to 'rewild' the area
- Make sure open space is open to the public & not gated
- Need to provide more leisure facilities in parks
- Need to improve air quality
- Use Sustainable Urban Drainage (SUDs) techniques (e.g. permeable pavements)

3.16 Theme 7: Transport and Communication

- Need for orbital travel linkages, in particular rail. Focus on east- west connections
- Improve connectivity across Barnet and between London boroughs
- Important to support people's access to town centres
- Need to better understand working from home and increase opportunities for working locally.
- Need for residents to access employment areas in Hertsmere

- Opportunities for self-drive electric cars
- Car-less development supported in southern half of Borough
- Need to make cycling a principle form of transport

3.17 Theme 8 Delivering the Local Plan

- Town centres have a key role in infrastructure delivery
- Need infrastructure to support growth especially schools & GPs
- Need for social, physical & green infrastructure integration.
- Need for Ultrafast Broadband. Opportunity to create spine with strategic providers
- Need for homes that are affordable
- Need to provide affordable workspace within new development
- Opportunities for car clubs in new developments and within town centres

3.18 General comments included

- The five themes of the 2012 Local Plan are all concerned with growth rather than the protection of the suburbs
- Issues offer so many generalisations it becomes idealistic
- How much autonomy does Barnet have with regard to planning?
- Need for more community-based approach to planning issues
- Need for meaningful partnership rather than consultation
- Need to address quality of life
- Need more attendance from the west of the borough

Appendix B - FAQs and Summary for Regulation 18 and Regulation 19 consultations

Regulation 18 FAQs



Barnet Local Plan

Draft Plan for Regulation 18 Consultation (January 2020)

Question	Response
General	
What is a Local Plan?	A Local Plan sets out the vision and aspirations for the future of an area, providing a suite of planning policies, and site proposals which are used for making decisions on planning applications. This Local Plan will help guide and shape development in Barnet until 2036. It will set out the level and distribution of growth, including new homes and businesses.
Why does London Borough of Barnet need to produce a Local Plan?	The Government requires all councils to have an up-to-date local development plan. It is a necessary part of creating a robust planning framework to support the future development of the Borough. Without it, the Council would lose the ability to secure and co-ordinate the development and infrastructure that are needed. In the absence of an up-to-date Local Plan decisions on planning applications are more likely to be made by the Secretary of State through the planning appeal process.
Doesn't Barnet already have a Local Plan?	Yes. The Council's current Local Plan comprises the Core Strategy (2012) and Development Plan Policies (2012). The policies in these documents are still in force but some are now out of date. The Council now needs to develop an up-to-date Local Plan to meet Barnet's future potential, planning for the next 15+ years up until 2036.
How often should a Local Plan be reviewed?	To be effective, plans need to be kept up-to-date. The National Planning Policy Framework (NPPF) states that policies in a Local Plan should be reviewed to

	<p>assess whether they need updating at least once every five years.</p>
<p>What weight does an emerging Local Plan carry in decision-making?</p>	<p>The NPPF sets out that decision-makers may give weight to relevant policies in an emerging Local Plans according to its stage of preparation, the extent to which there are unresolved objections to relevant policies, and their degree of consistency with policies in the NPPF.</p>
<p>What role does the London Plan Play?</p>	<p>All London Boroughs are responsible for preparing Local Plans for their own areas, but they must ensure that they conform generally to the Mayor's London Plan. The London Plan sets Borough level housing targets and identifies strategic locations for future growth along with strategic policies for delivering the such growth.</p> <p>London Boroughs are required to consult with the Mayor at different stages in the production of the Local Plan documents and other documents related to the Boroughs Local Plan.</p> <p>Barnet's draft Plan has been prepared to be in general conformity with the policies in both the adopted London Plan (2016) and the emerging London Plan (draft 2017), recognising that the latter is likely to be in place by the time the Barnet Local Plan is adopted.</p>
<hr/> <p>Consultation and next steps</p> <hr/>	
<p>What are the Council consulting on now?</p>	<p>The Council is consulting on a draft Local Plan (Regulation 18), which is the first stage in the Local Plan Process. This is known as the preferred policy approach. The Council is inviting comments on this approach.</p> <p>The consultation runs from Monday 27th January 2020 to Monday 16th March 2020. During this time, interested parties and stakeholders may make comments, also known as 'representations', on the draft plan. Consultation documents can be found on the Councils website at: https://engage.barnet.gov.uk/</p> <p>Following the end of the six-week consultation period, all responses received will be considered and used to help prepare a final draft Local Plan. This will be subject to a final consultation (Regulation 19) before it is submitted to the Planning Inspectorate for 'Examination in Public'.</p>

What is Regulation 18? Regulation 18 marks the start of the consultation stage for Barnet's Local Plan. Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012 requires that various bodies and stakeholders be notified that the Council is preparing a plan. It invites them to comment on the contents of the plan. Under Regulation 18, the Council must take into account all representations made.

Where can I view the Local Plan documents? The draft Local Plan is available to view at:

- Planning reception at 2 Bristol Avenue, Colindale, London NW9 4EW. (Monday, Wednesday and Friday, 9am– 1pm)
- local libraries (details and opening hours available at <https://www.barnet.gov.uk/libraries/library-opening-times>)
- online at <https://engage.barnet.gov.uk/>

Who can comment? The public consultation is open to everybody. The Council encourages all local residents and stakeholders to comment within the consultation timeframe.

How can I comment on the draft Local Plan? Comments can be made the following ways:

- Comments can be submitted online via the Barnet Engage website (<https://engage.barnet.gov.uk/>)
- In writing via Planning Policy Team, 7th Floor, 2 Bristol Avenue, Colindale, London, NW9 4EW or respond by email to forward.planning@barnet.gov.uk.

Further information is also available from the Planning Policy team on 020 8359 3000
When making your comments, please clearly state which section of the plan you are referring to.
Written Representations about the Local Plan must be submitted by one of the methods specified above no later than midnight on **Monday 16th March 2020**.

What will happen to my comments or The Council will acknowledge your response and will look at what issues have been raised in the consultation and decide whether the Local Plan

representations once I have made them?

needs to be amended to reflect them. Comments and information received will be used, together with updated evidence where required, to inform the next version of the Local Plan document known as Regulation 19.

Issues will be raised that are outside the remit of the Local Plan and the planning system. In such instances we will signpost to where an answer can be provided.

There will be a further opportunity to comment on the Regulation 19 version of the Local Plan and representations made at this stage will be forwarded to an independent planning inspector to consider. At the same time, we will provide a consultation statement setting out how we have taken people's comments into account.

What is the timetable for the Local Plan

The current timetable for the preparation of the Local Plan and consultation is set out below:

Key Stages	Date
Reg 18: Preparation of Local Plan and Consultation	Winter 2019 / 2020
Reg 19: Publication of Local Plan	Autumn 2020
Reg 22: Submission	Winter 2020/2021
Reg 24: Examination in Public	Summer 2021
Reg 26: Adoption	Winter 2021

Evidence Base

What does the evidence include and why is it necessary?

The Council's evidence base comprises of a number of different studies and reports that have been produced to support and justify the policies and proposals in the draft local plan.

An integrated Impact Assessment (comprising of Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA)) has also been published alongside the draft plan for comment

The evidence base will be updated and added to as the Local Plan progresses.

Where can I view the evidence to support the Draft Local Plan?

Supporting evidence can be found on our website: <https://www.barnet.gov.uk/planning-and-building/planning-policies-and-local-plan/local-plan-review/local-plan-evidence-and>

Content of the Draft Local Plan

**Why do we need so many new homes?
Where will they go?**

The Council has done an assessment of housing need. This shows that in order to meet household growth, as well as numbers of concealed as well as homeless households, factoring in the level of vacant homes, consideration of local market signals (with limited supply of new homes contributing to the high cost of housing) Barnet needs an additional 3,060 new homes each year.

At present the level of housing completions in Barnet is about 2,200 new homes per year.

On this basis the draft Plan seeks to deliver a minimum of 46,000 new homes over the 15 year plan period. Approximately 12,000 of these new homes already have planning permission in large schemes such as Brent Cross, Colindale Gardens, Millbrook Park and West Hendon

There are about 151,000 dwellings in Barnet so this would represent an increase of about 30% over 15 years.

New homes will be delivered in the most sustainable locations, places such as Brent Cross, Colindale, Cricklewood and Edgware as well as town centres. These are shown on the Key Diagram in the Local Plan.

Distributing growth to the most sustainable locations in Barnet is considered the right approach.

How will the Local Plan help meet affordable housing needs?

Figures show that in order to meet affordable housing needs, a minimum of 23% of overall housing delivery should be affordable accommodation. This will be a mixture of homes for rent and various forms of affordable home ownership.

This equates to a minimum of 10,600 new affordable homes by 2036. The Local Plan aims to deliver more than this level of affordable homes, seeking that a minimum of 35% affordable housing is delivered from all developments of 10 or more units.

	<p>S106 contributions from private development is the main mechanism for securing affordable housing through the planning system. Securing the right type of affordable homes through S106 has become more challenging as need has intensified.</p>
<p>How do we ensure that these new homes actually meet housing need?</p>	<p>The Plan sets out space requirements on the size of homes. It protects family housing from conversion and sets out policy for managing vacant homes as well as short-term lets. It sets out a clearer approach on housing options for older people. It also has policy on student accommodation and HMOs. The Plan supports wider housing choice. However, the planning system does not control who lives in these new dwellings.</p>
<p>Will more homes lead to more congestion in the Borough?</p>	<p>Levels of car ownership in Barnet are high with 142,000 cars, but attitudes are changing particularly among younger residents. Car sharing schemes have become more popular as have more active and sustainable forms of transport such as walking, cycling and public transport.</p> <p>The Local Plan recognises that the car remains an important travel choice for parts of the Borough where alternative options such as public transport are more limited. The Local Plan has developed a parking policy to reflect this. The Local Plan also aims to tackle inefficient use of land created by surface level car parking.</p> <p>In addition, the Local Plan promotes more sustainable travel modes where possible and the delivery of new transport infrastructure to support the travel needs of a growing population.</p>
<p>What impact will Brexit have on housing numbers?</p>	<p>Household projections may change because of Brexit, but the indications are that London will continue to grow. This reflects projections by the GLA. It is generally accepted that the UK is facing a housing crisis, which is partly due to the historic under delivery of houses. The Government wants to build 300,000 new homes every year and has much higher expectations of housing delivery in Barnet.</p>
<p>What will the Local Plan do for jobs?</p>	<p>The Local Plan safeguards existing land for employment ensuring that Barnet retains blue-collar as well as white collar jobs. New development is required to contribute to skills and training so that we help residents benefit from the opportunities of</p>

inward investment. We are also helping new enterprises by securing affordable workspace.

What about infrastructure? We need new GP surgeries, schools, public transport and utilities?

The Local Plan is not just about new homes and jobs; we also need a range of infrastructure to support growth including schools, GPs, public transport, roads, utilities, parks and leisure facilities. New development will be carefully controlled to ensure that the necessary infrastructure is provided in a timely manner.

The next version of the Local Plan (Regulation 19) will be supported by an Infrastructure Delivery Plan (IDP). The IDP will provide an assessment of current infrastructure provision, future needs, gaps and deficits, along with an indication of costs of providing infrastructure.

How will infrastructure be funded?

Community Infrastructure Levy (CIL) is a planning charge that local authorities and the Mayor of London can set on new development to help pay for community infrastructure. It is intended to offer transparency, consistency and fairness for all developers and local authorities, whilst keeping a balance between the cost of funding infrastructure and the viability of development.

Most development is subject to pay CIL. The Barnet CIL Charging Schedule is as follows:

- £135 Residential (C1 - C4, Sui Generis HMOs)
- £135 Retail (A1 - A5)
- £0 All other use classes

CIL regulations require that a proportion of CIL (15%) is set aside as Neighbourhood CIL (NCIL) to be spent on local priorities identified by local communities. Where a neighbourhood plan exists, the proportion of NCIL is higher (25%) and is to be spent on infrastructure identified in the relevant neighbourhood plan.

Another mechanism for funding infrastructure is through planning obligations (Section 106 agreements). These may include or contribute to the provision of new infrastructure in order to mitigate impacts from development.

Will the Local Plan help stop town centre decline?	Town centres are a major focus for this Local Plan. We want to attract inward investment into these places acknowledging that they remain important centres for commercial, leisure and community uses as well as providing new homes. Making town centres attractive and safe places where people want to work, rest and play is a priority for the Plan. Investment in food and drink uses is set to increase as is an evening economy.
Will the Local Plan do anything to help mitigate and adapt to climate change?	<p>The Council is on a credible path to achieving net zero emissions. The Council uses planning policy and guidance produced by the Mayor of London to make London a zero-carbon city by 2050. We have existing guidance on sustainable design and construction from 2016 which we will revisit following adoption of this Plan.</p> <p>The Local Plan is addressing the inefficient use of land created by surface level car parking. This is reflected in our site proposals. More is done to promote active and sustainable travel; car free development may be appropriate in areas with good public transport access. Growth is focused in the most sustainable locations with good public transport connections.</p>
Sites	
How have proposed sites been selected?	These sites have been submitted by landowners. The selection of sites reflects an extensive information gathering and assessment process. We consider these sites to be developable. Based on this work we have set out principles of development. On this basis, we would expect a planning application to come forward with more detail.
Will the sites that are eventually chosen automatically get planning permission?	No, any planning application to develop a site will be subject to the relevant planning procedures and assessed accordingly.

Regulation 18 Summary

Barnet Local Plan

Introduction

The purpose of Local Plan is to shape growth & change across the Borough over a 15 year period.

- Barnet's new Local Plan will cover 2021 to 2036.
- It contains 51 Planning Policies & 67 Sites identified as suitable for development
- replaces Barnet's Local Plan from 2012

By 2036 Barnet aims to deliver

- 46,000 new homes across the Borough
- Up to 467,000 m2 of new office space
- Up to 165,000 m2 of new retail space
- A new regional park and 3 sports and recreational hubs

Sustainable Growth

The Key Diagram shows broad locations of where growth will be focused

Key Diagram

- Green Belt
- Metropolitan Open Land
- Growth Areas
- Opportunity Areas
- District Town Centres
- Estate Renewal and Infill
- Train Lines
- Crossrail 2
- West London Orbital
- Rail Stations
- London Underground Station
- Railway Station
- Major Thoroughfares
- A1000 Great North Road/High Road
- A598 Ballards Lane/Regents Park Road/ Finchley Road
- A5 Edgware Road/ Watling Street
- A504 Hendon Lane
- A110 East Barnet Road

- Sustainable Growth focussed on 6 Growth Areas, Town Centres, Transport Nodes, Estate Renewal & Major Thoroughfares
- Housing - Barnet's evidence shows that approx 46,000 new homes are needed (i.e. around 3,000 per annum).
- Officespace - up to 67,000m2 of new space across town centres (in addition to BX)
- Retail - up to 110,000m2 of retail across town centres (in addition to BX)
- Jobs - deliver space to support 27,000 jobs
- Parks & Recreation - 3 new destination hubs & new Regional Park
- Community Infrastructure - to keep pace with development
- Transport - new stations at Colindale & Brent Cross West

Brent Cross (BX)

- 7,500 new homes
- Up to 400,000m2 of office floorspace
- Up to 55,000m2 of retail, leisure and other uses

Brent Cross West

- Brent Cross West Station
- Connection to West London Orbital Route
- 1,800 new homes

Cricklewood

- 1,400 new homes
- Increased employment space
- Connection to West London Orbital

Edgware

- 5,000 new homes
- Improved leisure provision
- Night Time Economy

Colindale

- 4,200 new homes in addition to those already planned
- New Local Centre
- New pedestrian and cycle routes

Mill Hill East

- 1,400 new homes in addition to those already planned
- Good suburban growth
- Mill Hill Station improvements

Barnet's District Town Centres

- Capacity for 6,100 new homes
- Improvements to public realm
- Improvements to town centre offer

Existing and Major New Transport Infrastructure

- 3,450 new homes
- West London Orbital / Crossrail 2
- Woodside Park & Hendon stations

Estate Renewal and Infill

- Improvements to quality
- No loss of affordable homes
- Mayor's Good Practice Guide

Major Thoroughfares

- Capacity for 4,900 new homes
- High quality design
- Healthy Streets Approach

These areas generally have higher public transport accessibility (PTAL) & can be delivered with less car parking.

Town centres need to adapt with a wider mix of uses if they are to remain vibrant.

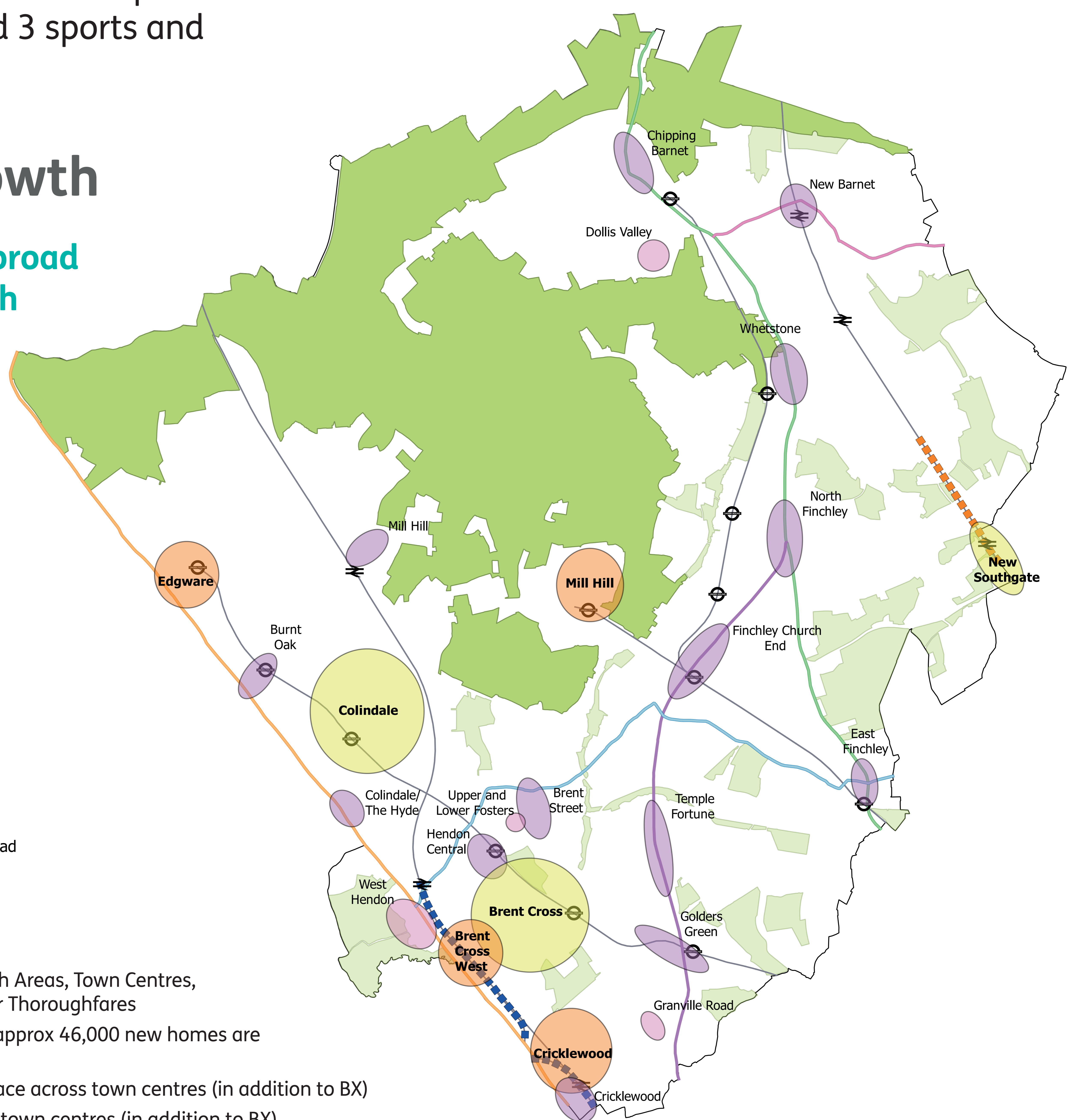
Safeguards the character & amenity of existing suburban neighbourhoods.

Local Plan Timetable

This is the start of a 2 year process involving at least 2 periods of public consultation

▼ We are here

Regulatory Stages and Timetable					
Evidence gathering and pre-preparation stage (Including consulting on sustainability reports where applicable)	Reg 18: Preparation of Local Plan and Consultation Opportunity for interested parties and statutory consultees to be involved at an early stage.	Reg 19: Publication of Local Plan for making representation on soundness issues (NPPF para 35) The Council publishes the draft plan. There follows a period of at least 6 weeks for making representations.	Reg 22: Submission The Council submits the Local Plan to the Secretary of State with representations received.	Reg 24: Examination in Public Conducted by independent Planning Inspector who will consider representations made at Reg 22 stage.	Reg 26: Adoption Subject to outcome of examination, including consultation on main modifications, the Council formally adopt the plan.
Summer 2017-ongoing	Winter 2019/20	Autumn 2020	Winter 2020/21	Summer 2021	Winter 2021



Barnet Local Plan

Introduction

The purpose of the Local Plan is to shape growth & change across the Borough over a 15 year period.

- Barnet’s new Local Plan will cover 2021 to 2036.
- 52 Planning Policies & 65 Sites
- It replaces Barnet’s Local Plan from 2012

By 2036 Barnet aims to deliver

- A minimum of 35,640 new homes across the Borough
- Up to 67,000 m2 of new office space in Town Centres
- A new Metropolitan Town Centre at Brent Cross
- A new regional park and 3 sports and recreational hubs

Timetable

This is the 2nd stage of engagement before submission to Secretary of State.

We are here
▼

Regulatory Stages and Timetable

Evidence gathering and pre-preparation stage	Reg 18: Preparation of Local Plan and Consultation	Reg 19: Publication of Local Plan for making representation on soundness issues (NPPF para 35)	Reg 22: Submission	Reg 24: Examination in Public	Reg 26: Adoption
(Including consulting on sustainability reports where applicable)	Opportunity for interested parties and statutory consultees to be involved at an early stage.	The Council publishes the draft plan. There follows a period of at least 6 weeks for making representations.	The Council submits the Local Plan to the Secretary of State with representations received.	Conducted by independent Planning Inspector who will consider representations made at Reg 22 stage.	Subject to outcome of examination, including consultation on main modifications, the Council formally adopt the plan.
Summer 2017-ongoing	Winter 2020	Summer 2021	Autumn 2021	Spring 2022	Autumn 2022

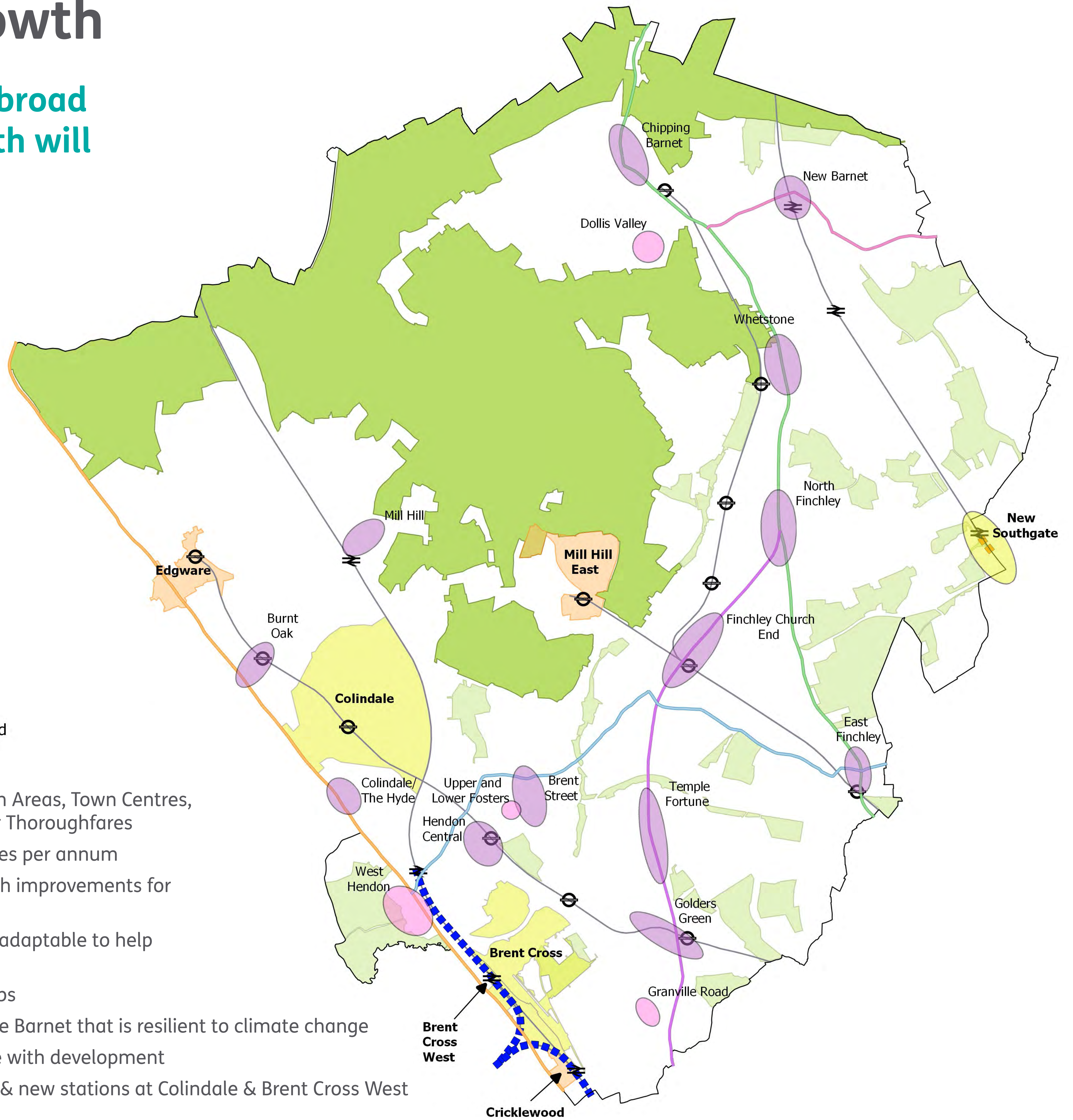
Barnet Local Plan

Sustainable Growth

The Key Diagram shows broad locations of where growth will be focused.

Key Diagram

- Green Belt
- MOL Barnet
- Growth Areas
- Opportunity Areas
- District Town Centres
- Estate Renewal and Infill
- Train Lines
- Crossrail 2
- West London Orbital
- Rail Stations**
- London Underground Station
- Railway Station
- Major Thoroughfares**
- A1000 Great North Road/High Road
- A110 East Barnet Road
- A5 Edgware Road/ Watling Street
- A504 Hendon Lane
- A598 Ballards Lane/Regents Park Road/ Finchley Road



- Sustainable Growth focussed on 6 Growth Areas, Town Centres, Transport Nodes, Estate Renewal & Major Thoroughfares
- Delivering a minimum of 2,364 new homes per annum
- Delivering a healthy streets approach with improvements for walking & cycling
- Making Town Centres more responsive & adaptable to help COVID-19 recovery
- Jobs – deliver space to support 27,000 jobs
- Delivering an environmentally sustainable Barnet that is resilient to climate change
- Community Infrastructure – to keep pace with development
- Transport – West London Orbital Railway & new stations at Colindale & Brent Cross West

Brent Cross

- Comprehensive regeneration in 3 parts – North, Town & West (Thameslink) delivering 9,500 new homes
- North – major retail & leisure destination for North London
- Town – new residential & commercial quarter
- West (Thameslink) – new station to be completed by 2022

Brent Cross West

- Growth Area around new station
- West London Orbital Railway delivered by 2029
- 1,800 new homes

Cricklewood

- Improved offer to create diverse & thriving Town Centre
- 1,400 new homes
- Connection to West London Orbital

Edgware

- 5,000 new homes
- Improved public realm & leisure provision
- Integrated Transport Hub

Colindale

- Where cycling, walking & public transport preferred for travel
- 4,100 new homes

Mill Hill East

- 1,500 new homes in addition to those already planned
- Good suburban growth
- Mill Hill Station improvements

Barnet's District Town Centres

- Potential for 5,400 new homes
- Improvements to public realm
- Thriving places that have recovered from COVID-19

Existing and Major New Transport Infrastructure

- 1,650 new homes
- West London Orbital
- Revitalised transport hubs

Estate Renewal and Infill

- Improvements to quality
- No loss of affordable homes
- Mayor's Good Practice Guide

Major Thoroughfares

- Potential for 3,350 new homes
- High quality design
- Healthy Streets Approach

These areas generally have higher public transport accessibility (PTAL) & can be delivered with less car parking.

Town centres need to adapt with a wider mix of uses if they are to remain vibrant.

Safeguards the character & amenity of existing suburban neighbourhoods.

Key changes

compared to the current Local Plan

Affordable Housing (Policy HOU01)

- minimum of 35% Affordable Housing from developments of 10 or more dwellings within context of strategic London Plan target of 50%.
- Sets out requirements on calculations & tenure split including new affordable housing products

Residential Conversions & Re-development (Policy HOU03)

- Restricted to large houses with original gross internal area (GIA) of at least 130m² to smaller homes except within 400m of town centres or in an area with high PTAL
- Require family sized home (at least 74m² GIA) on ground floor

Efficient Use of Housing Stock (Policy HOU05)

- Stronger on loss of existing residential – Town Centres are preferred location for new community uses
- Highlights regulatory powers to reduce vacant homes & control short-stay accommodation

Tall Buildings (Policy CDH04)

- Tall buildings defined as 8 to 14 storeys may be appropriate in Brent Cross, Brent Cross West, Colindale, Cricklewood, Edgware, West Hendon, New Southgate, Major Thoroughfares (A5 and A1000), Finchley Central and North Finchley.
- Very tall buildings defined as 15 storeys or more will not be permitted unless exceptional circumstances can be demonstrated such as appropriate siting within an Opportunity Area or Growth Area

Barnet's Parks & Open Spaces (Policy ECC04)

- Emphasises improving the quality of spaces of low quality and low amenity as identified in the Parks and Open Spaces Strategy.

Development Principles in Town Centres (Policy TOW02)

- More protection of retail uses as part of the Commercial Business & Service uses in town centres, local centres and parades
- More protection of retail in local centres and parades

Managing Town Centre Uses (Policy TOW03)

- Managing clustering of new Hot Food Takeaways, Adult Gaming Centres, Betting Shops & Shisha Bars

Night Time Economy (Policy TOW04)

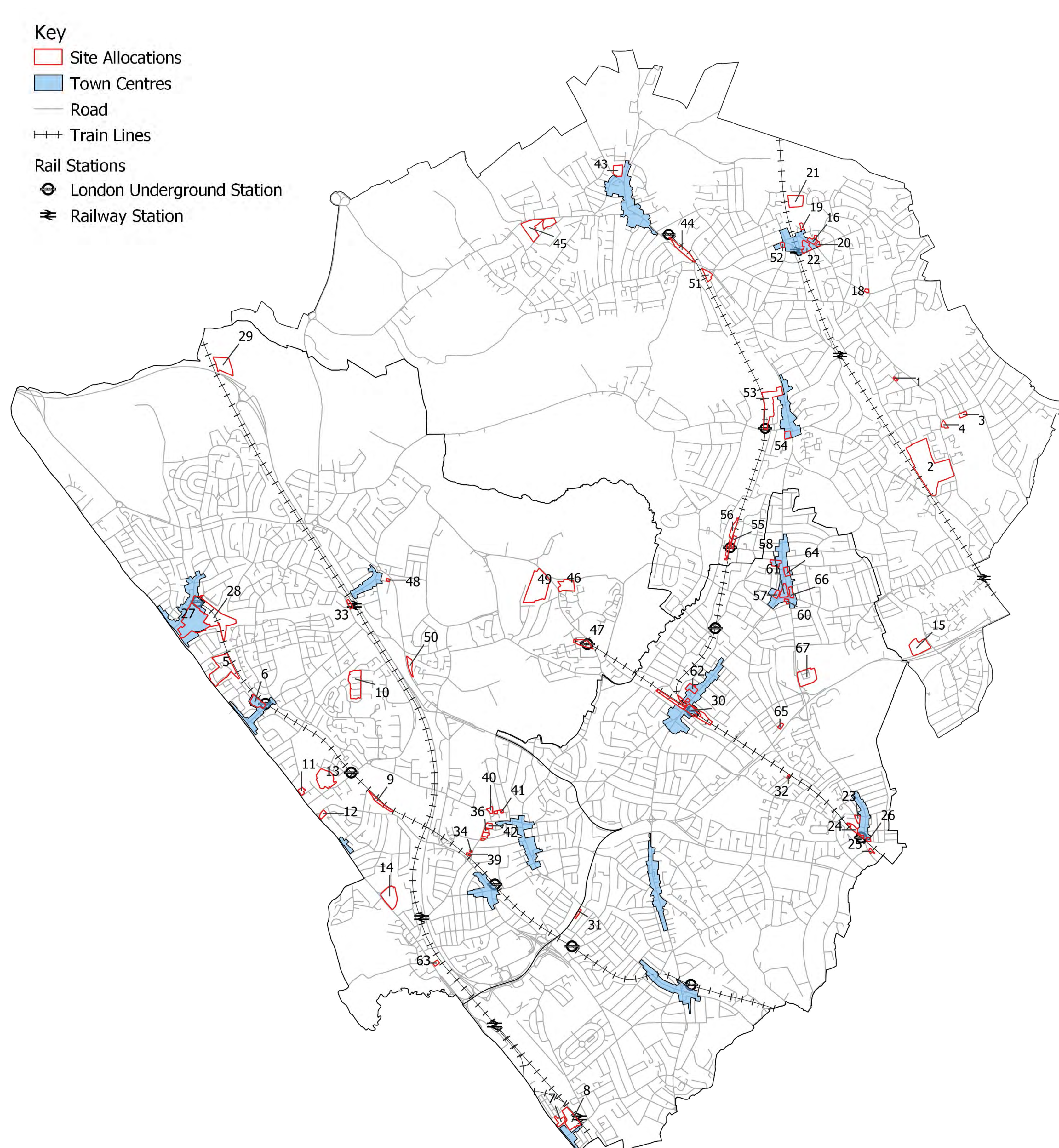
- Support safer & more welcoming town centres
- Chipping Barnet, Cricklewood, Edgware, Golders Green & North Finchley as well as Brent Cross
- Manage impact on amenity & historic distinctiveness

Parking Management (Policy TRC03)

- Evidence based approach on residential car parking
- Reflects access to Public Transport
- Zero car parking may be appropriate in areas with high PTAL

Water Management (Policy ECC02A)

- Manages flood risk from rivers, streams, surface water & ensures developments are responsible regarding water use & not built too close to rivers and streams



Sites

All 65 proposals sites are subject to the planning policies in the Local Plan and the London Plan, and must be

Deliverable i.e. it should be available now and offer a suitable location for the proposed use(s) and a good prospect that proposal will be delivered within next five years

OR

Developable i.e. it should be in a suitable location for the proposed use(s) and there should be a reasonable prospect that it will be available for and could be developed within 15 years.

Consultation

This is the second stage of consultation on the new Barnet Local Plan, known as the Regulation 19 publication stage

Read the Plan and respond through our representation form at <https://engage.barnet.gov.uk/>



- Consultation runs from 28th June to 9th August 2021
- All written comments received will be sent on to the Planning Inspectorate when the Council submits the Local Plan or Examination in Public (Autumn 2021)
- Adoption of the new Local Plan is expected by the end of 2022

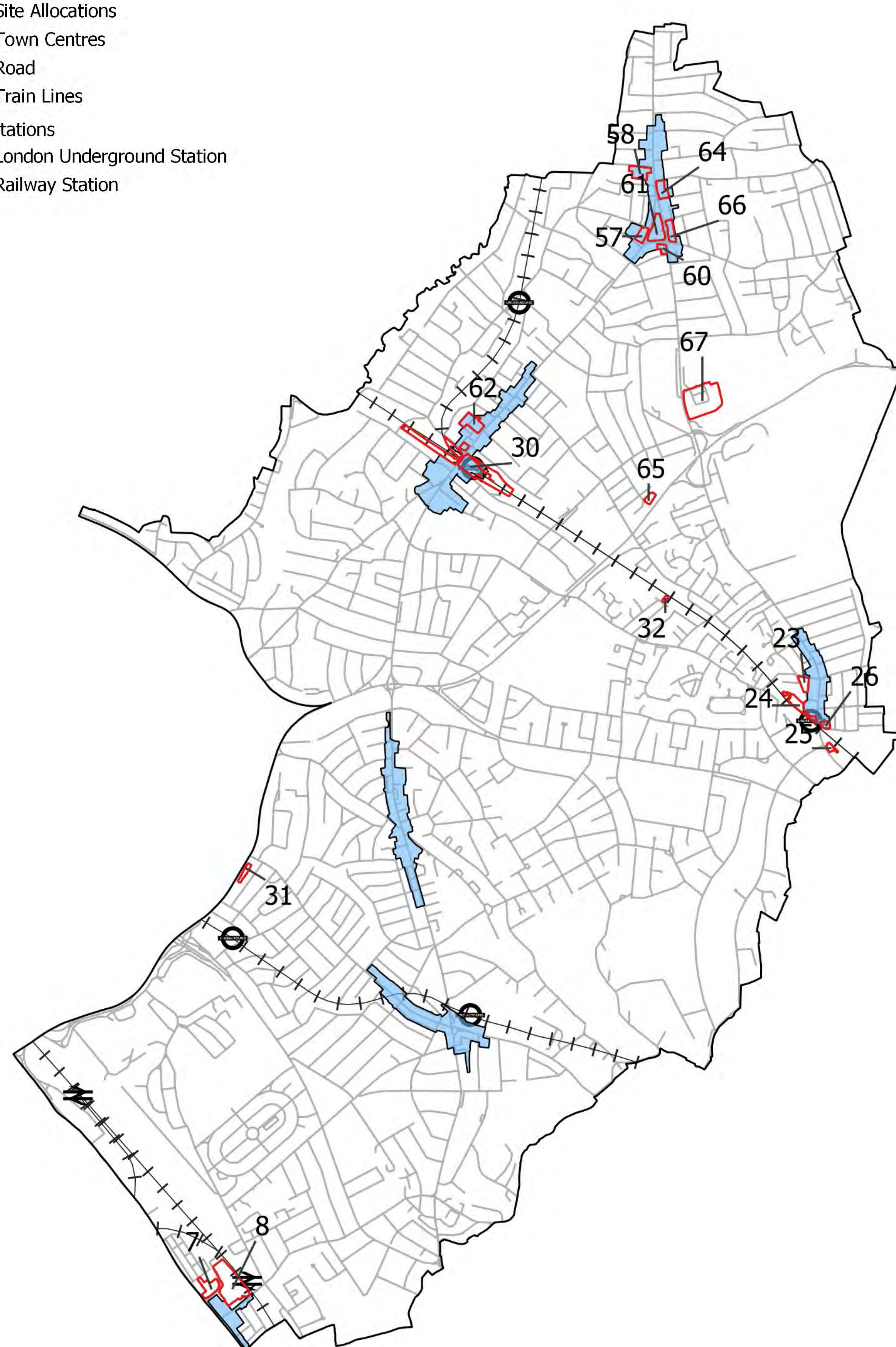
Finchley and Golders Green

Town Centres in the area:

North Finchley, Finchley Central/Church End, Golders Green, East Finchley, Temple Fortune and Cricklewood these could all experience an increase in the number of homes in the town centre and on the periphery. Brent Cross Opportunity Area is also situated within the area.

There are 19 sites identified for potential redevelopment within the area, including the Finchley Central and East Finchley Station carparks and the Broadway Retail Park.

Key
 Site Allocations
 Town Centres
 Road
 Train Lines
 Rail Stations
 London Underground Station
 Railway Station



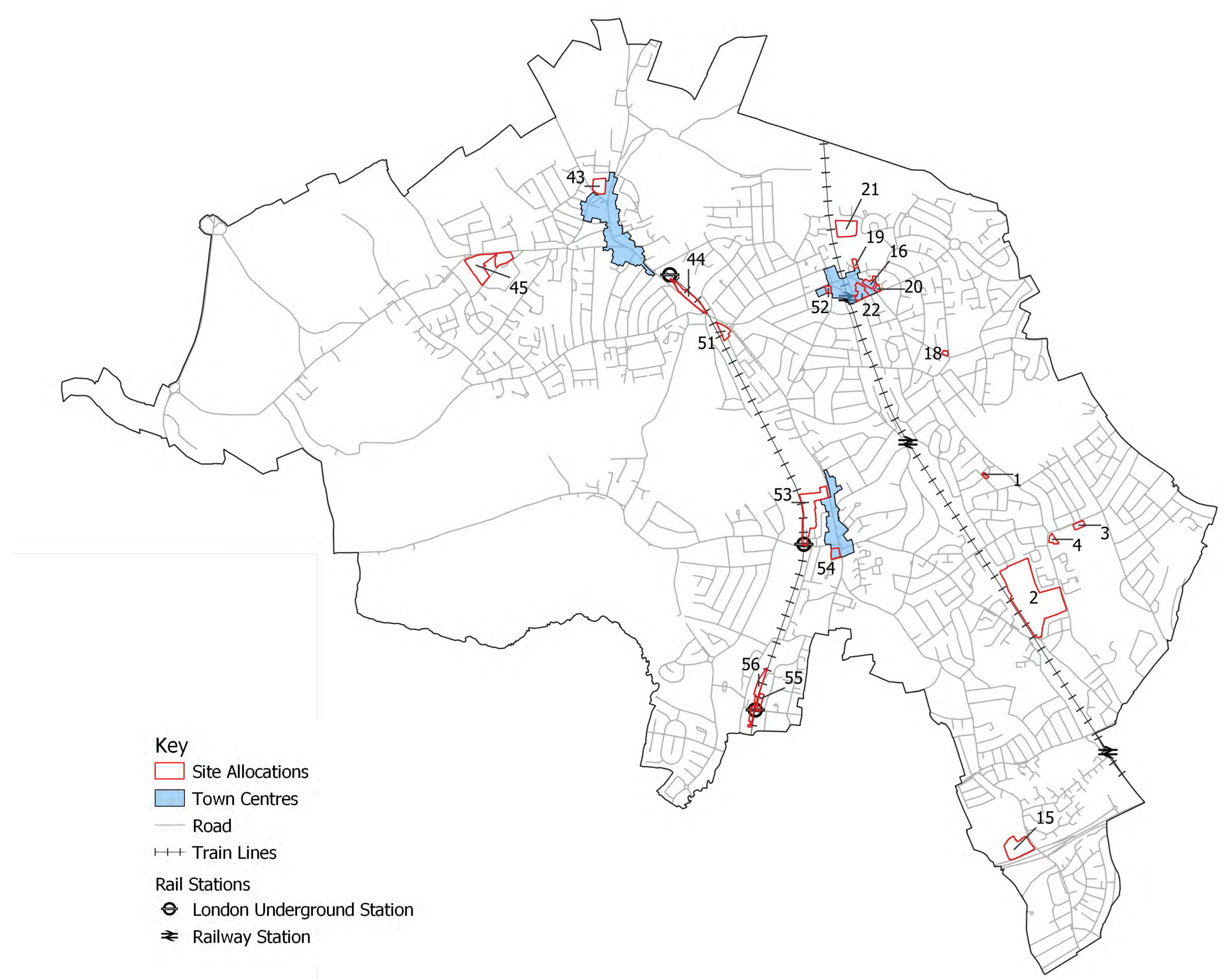
Site No	Site Name	Ward	Constituency	Indicative Residential Unit Numbers	Non-residential Uses
7	Beacon Bingo	Childs Hill	Finchley & Golders Green	132	Leisure uses
8	Broadway Retail Park	Childs Hill	Finchley & Golders Green	1,007	Commercial – retail and community
23	Bobath Centre	East Finchley	Finchley & Golders Green	25	Community
24	East Finchley Station Carpark	East Finchley	Finchley & Golders Green	135	Commercial (office) and public car parking
25	East Finchley Substation	East Finchley	Finchley & Golders Green	23	-
26	Park House	East Finchley	Finchley & Golders Green	19	Community
30	Finchley Central Station	Finchley Church End	Finchley & Golders Green	556	Transport, commercial (retail and offices) and car parking
31	Brentmead Place	Golders Green	Finchley & Golders Green	46	-
32	Manor Park Road Carpark	Golders Green	Finchley & Golders Green	7	-
57	309-319 Ballards Lane	West Finchley	Finchley & Golders Green	130	Commercial (retail and office) and community
58	811 High Rd & Lodge Lane Carpark	West Finchley	Finchley & Golders Green	132	Commercial (retail and office) and public car parking
59	Central House	West Finchley	Finchley & Golders Green	48	Commercial (retail and office)
60	Finchley House	West Finchley	Finchley & Golders Green	202	Commercial (office) and community
61	Tally Ho Triangle	West Finchley	Finchley & Golders Green	281	Commercial (retail and office) leisure, transport, car parking and community facilities
62	Tesco Finchley	West Finchley	Finchley & Golders Green	170	Commercial (retail and office) and car parking
64	744-776 High Rd	Woodhouse	Finchley & Golders Green	175	Commercial (retail and office)
65	Barnet Mortuary (former)	Woodhouse	Finchley & Golders Green	20	-
66	East Wing	Woodhouse	Finchley & Golders Green	125	Commercial (retail and office) and culture
67	Great North Leisure Park	Woodhouse	Finchley & Golders Green	352	Sports and leisure, commercial (restaurants and cafes), community and car parking

Chipping Barnet

Town Centres in the area:

High Barnet, New Barnet, Whetstone and East Barnet these could all experience an increase in the number of homes in the town centre and on the periphery. The New Southgate Opportunity Area is also situated within the area.

There are 20 sites identified for possible redevelopment within the area, including High Barnet and Woodside Park Station car parks, North London Business Park and Allum Way.



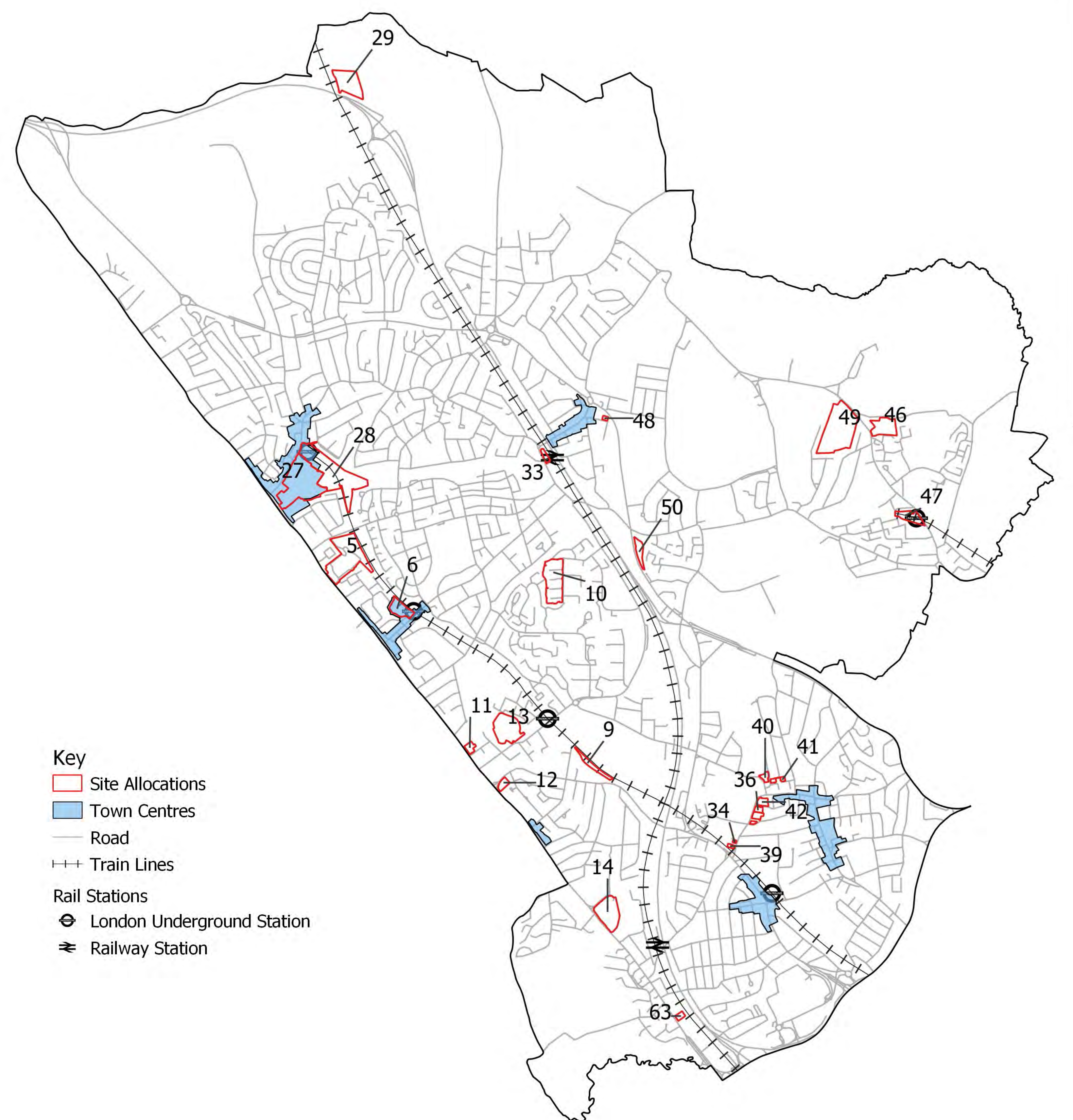
Site No	Site Name	Ward	Constituency	Indicative Residential Unit Numbers	Non-residential Uses
1	Former Church Farm Leisure Centre	Brunswick Park	Chipping Barnet	12	-
2	North London Business Park	Brunswick Park	Chipping Barnet	1,350	A school, multi-use sports pitch, employment and associated car parking.
3	Osidge Lane Community Halls	Brunswick Park	Chipping Barnet	16	Community uses, school access and retained parking
4	Osidge Library & Health Centre	Brunswick Park	Chipping Barnet	16	Community uses, school access and retained parking
15	Tesco Coppets Centre	Coppetts	Chipping Barnet	397	Commercial (retail), community and car parking
16	45-69 East Barnet Rd	East Barnet	Chipping Barnet	110	Commercial (retail and office)
18	Former East Barnet Library	East Barnet	Chipping Barnet	12	Community
19	East Barnet Shooting Club	East Barnet	Chipping Barnet	43	-
20	Fayer's Building Yard & Church	East Barnet	Chipping Barnet	25	Community
21	New Barnet Gasholder	East Barnet	Chipping Barnet	201	Community
22	Sainsburys East Barnet Rd	East Barnet	Chipping Barnet	199	Commercial (retail and office) and car parking
43	Army Reserve Depot	High Barnet	Chipping Barnet	193	Community (office) and community
44	High Barnet Station	High Barnet	Chipping Barnet	292	Public car parking and employment. Designated within UDP (2006) as Site 26 supporting commercial (office), hotel and leisure
45	Whalebones Park	High Barnet	Chipping Barnet	149	Community facilities and local green space
51	Great North Road Local Centre	Oakleigh	Chipping Barnet	84	Commercial (office)
52	Kingmaker House	Oakleigh	Chipping Barnet	61	Commercial (office)
53	Allum Way	Totteridge	Chipping Barnet	600	TfL rail infrastructure commercial (office and light industrial), community and car parking
54	Barnet House	Totteridge	Chipping Barnet	139	Commercial (office) and community
55	Woodside Park station East	Totteridge	Chipping Barnet	95	Car parking
56	Woodside Park Station West	Totteridge	Chipping Barnet	356	-

Hendon

Town Centres in the area:

Edgware, Burnt Oak, Colindale- the Hyde, Hendon, Brent Street and Mill Hill. These could all experience an increase in the number of homes in the town centre and on the periphery. Colindale Opportunity Area is also situated within the area.

There are 26 sites identified for possible redevelopment within the area, including Brent Cross and Brent Cross West, sites along the A5, Edgware Hospital, and IBSA House and Watchtower House on the Ridgeway.



Site No	Site Name	Ward	Constituency	Indicative Residential Unit Numbers	Non-residential Uses
5	Edgware Hospital	Burnt Oak	Hendon	366	Hospital continuing in use, with associated car parking
6	Watling Avenue Carpark & Market	Burnt Oak	Hendon	160	40% mixed uses (station building, retail and car parking)
9	Colindeep Lane (adjacent to Northern Line)	Colindale	Hendon	128	-
10	Douglas Bader Park Estate	Colindale	Hendon	478	Small quantum of community facilities and commercial (retail)
11	KFC/ Burger King Restaurant	Colindale	Hendon	162	Commercial use (restaurant) and takeaway
12	McDonald's Restaurant	Colindale	Hendon	175	Commercial uses (restaurant) and takeaway
13	Public Health England	Colindale	Hendon	794	Community
14	Sainsburys The Hyde	Colindale	Hendon	1,309	Commercial (retail), community and car parking
27	Edgware Town Centre	Edgware	Hendon	2,379	Commercial (retail and office) entertainment and community
28	Edgware Underground & Bus Stations	Edgware	Hendon	2,317	Transport, commercial (retail and office) and community
29	Scratchwood Quarry	Edgware	Hendon	-	Waste
33	Bunns Lane Carpark	Hale	Hendon	43	Hotel and car parking
34	Burroughs Gardens Carpark	Hendon	Hendon	9	-
35	Egerton Gardens Carpark	Hendon	Hendon	23 (69 student halls of residence)	-
36	Fenella	Hendon	Hendon	60 (180 student halls of residence)	Educational
38	Ravensfield House	Hendon	Hendon	84 (252 student halls of residence)	Educational uses
39	The Burroughs Carpark	Hendon	Hendon	21	-
40	Meritage Centre	Hendon	Hendon	36 (108 student halls of residence)	Community

Site No	Site Name	Ward	Constituency	Indicative Residential Unit Numbers	Non-residential Uses
41	PDSA & Fuller St Carpark	Hendon	Hendon	12 (36 student halls of residence)	Community
42	Usher Hall	Hendon	Hendon	39 (117 student halls of residence)	-
46	IBSA House	Mill Hill	Hendon	197	-
47	Mill Hill East Station	Mill Hill	Hendon	127	Rail infrastructure and car parking
48	Mill Hill Library	Mill Hill	Hendon	19	Community
49	Watchtower House & Kingdom Hall	Mill Hill	Hendon	224	Open Green Belt and community uses
50	Watford Way & Bunns Lane	Mill Hill	Hendon	105	-
63	Philex House	West Hendon	Hendon	48	-

Key changes

compared to the current Local Plan 2012

HOU01 – Affordable Housing

- minimum of 35% Affordable Housing from developments of 10 or more dwellings within context of strategic London Plan target of 50%.
- Sets out requirements on calculations & tenure split including new affordable housing products

HOU03 – Residential Conversions

- Generally restrict conversion of large houses with original gross internal area (GIA) of at least 130m² to smaller homes except within 400m of town centres or in an area with high PTAL
- Require family sized home (at least 74m² GIA) on ground floor

HOU05 – Efficient Use of Housing Stock

- Stronger on loss of existing residential – Town Centres are preferred location for new community uses
- Highlights regulatory powers to reduce vacant homes & control short-stay accommodation

CDH04 – Tall Buildings

- Tall buildings defined as 8 to 14 storeys may be appropriate in Edgware, Finchley Central, North Finchley, West Hendon, A5 & A1000.
- Appropriate locations – Brent Cross, Brent Cross West, Colindale, Cricklewood, Edgware, Finchley Central, New Southgate, North Finchley, West Hendon, A5 and A1000 identified for Tall (between 8 and 14 storeys) or Very Tall (over 14 storeys) Buildings

ECC04 – Barnet's Parks & Open Spaces

- Emphasises improving the quality of spaces of low quality and low amenity as identified in the Parks and Open Spaces Strategy.

TOW02 – Development Principles in Town Centres

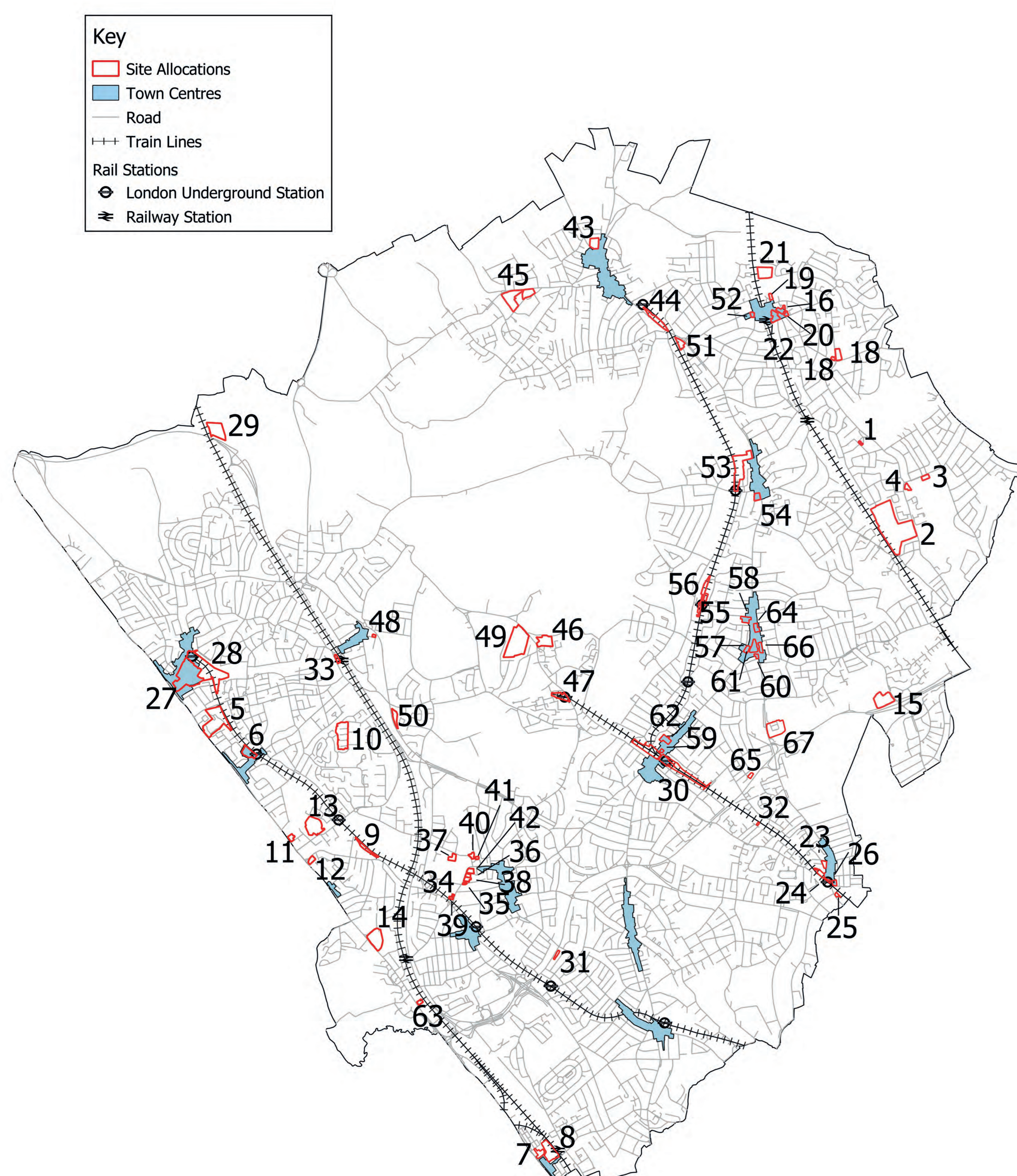
- more flexibility for non retail uses in town centres
- more protection of retail in local centres and parades

TOW04 – Night Time Economy

- Support safer & more welcoming town centres
- Chipping Barnet, Cricklewood, Edgware, Golders Green & North Finchley as well as Brent Cross
- Manage impact on amenity & historic distinctiveness

TRC03 – Parking Management

- Evidence based approach on residential car parking
- Reflects access to Public Transport
- Zero car parking may be appropriate in areas with high PTAL



Sites

All 67 proposals sites are subject to planning policies in Local Plan and the London Plan, and must be

Deliverable i.e. it should be available now and offer a suitable location for the proposed use(s) and a good prospect that proposal will be delivered within next five years

OR

Developable i.e. it should be in a suitable location for the proposed use(s) and there should be a reasonable prospect that it will be available for and could be developed within 15 years.

Consultation

This is the first consultation on the new Barnet Local Plan, known as the Regulation 18 consultation.

Find it and help in how to respond through our consultation questionnaire at <https://engage.barnet.gov.uk/>

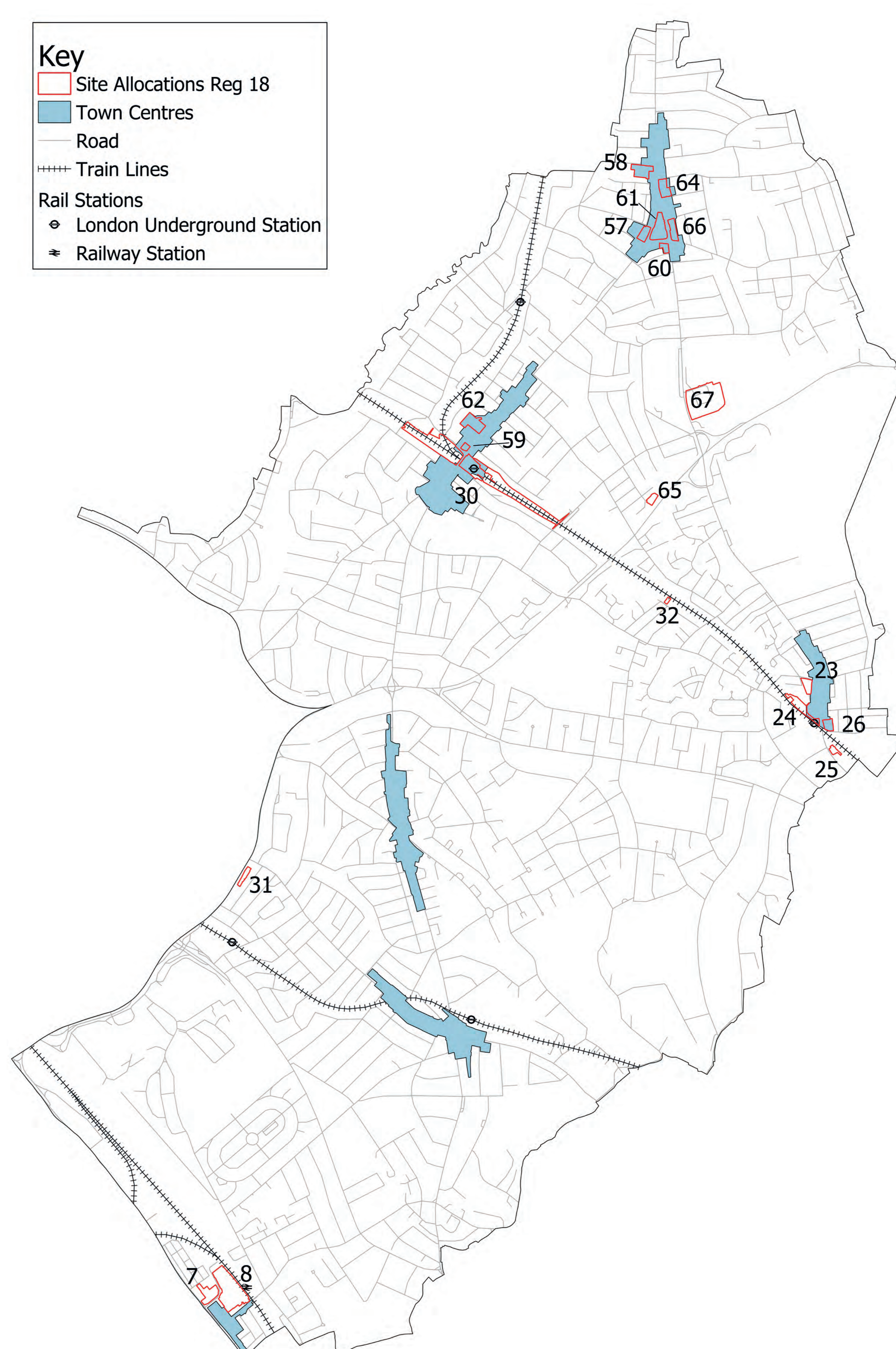


- Consultation runs from January 27th to March 16th 2020
- All comments will be considered and changes made to the Local Plan where appropriate.
- The second round of consultation known as Regulation 19 is expected in Autumn 2020
- The Council will then submit the Plan to the Planning Inspectorate and take it through an Examination in Public (Winter-Summer 2021)
- Adoption of the new Local Plan is estimated for late 2021

Finchley and Golders Green

Sites in the area:

There are 19 sites identified for potential redevelopment within the area, including the Finchley Central and East Finchley Station carparks and the Broadway Retail Park.



Site No	Site Name	Ward	Indicative Residential Unit Numbers	Non-residential Uses
7	Beacon Bingo	Childs Hill	132	30% leisure uses
8	Broadway Retail Park	Childs Hill	1,007	10% mixed uses (retail and community)
23	Bobath Centre	East Finchley	25	75% community uses
24	East Finchley Station Carpark	East Finchley	135	30% mixed uses (office and public car parking)
25	East Finchley Substation	East Finchley	31	-
26	Park House	East Finchley	44	20% mixed use (replacement community facility)
30	Finchley Central Station	Finchley Church End	556	50% mixed uses (transport, retail, offices, car parking)
31	Brentmead Place	Golders Green	46	-
32	Manor Park Road Carpark	Golders Green	7	-
57	309-319 Ballards Lane	West Finchley	130	20% mixed uses (retail, office and community)
58	811 High Rd & Lodge Lane Carpark	West Finchley	132	30% mixed uses (retail, office and replacement public car parking)
59	Central House	West Finchley	48	20% retail and office use
60	Finchley House	West Finchley	202	20% mixed uses (office and community)
61	Tally Ho Triangle	West Finchley	281	30% mixed uses (leisure, retail, office, transport, public car parking and community uses)
62	Tesco Finchley	West Finchley	170	25% mixed uses (retail, office and car parking)
64	744-776 High Rd	Woodhouse	175	20% retail and office use
65	Barnet Mortuary (former)	Woodhouse	20	-
66	East Wing	Woodhouse	125	30% mixed uses (retail, office and cultural)
67	Great North Leisure Park	Woodhouse	352	40% mixed uses (sports and leisure, community uses and replacement car parking)

Town Centres in the area:

North Finchley, Finchley Central / Church End, Golders Green, East Finchley, Temple Fortune and Cricklewood these could all experience an increase in the number of homes in the town centre and on the periphery. Brent Cross Opportunity Area is also situated within the area.

Chipping Barnet

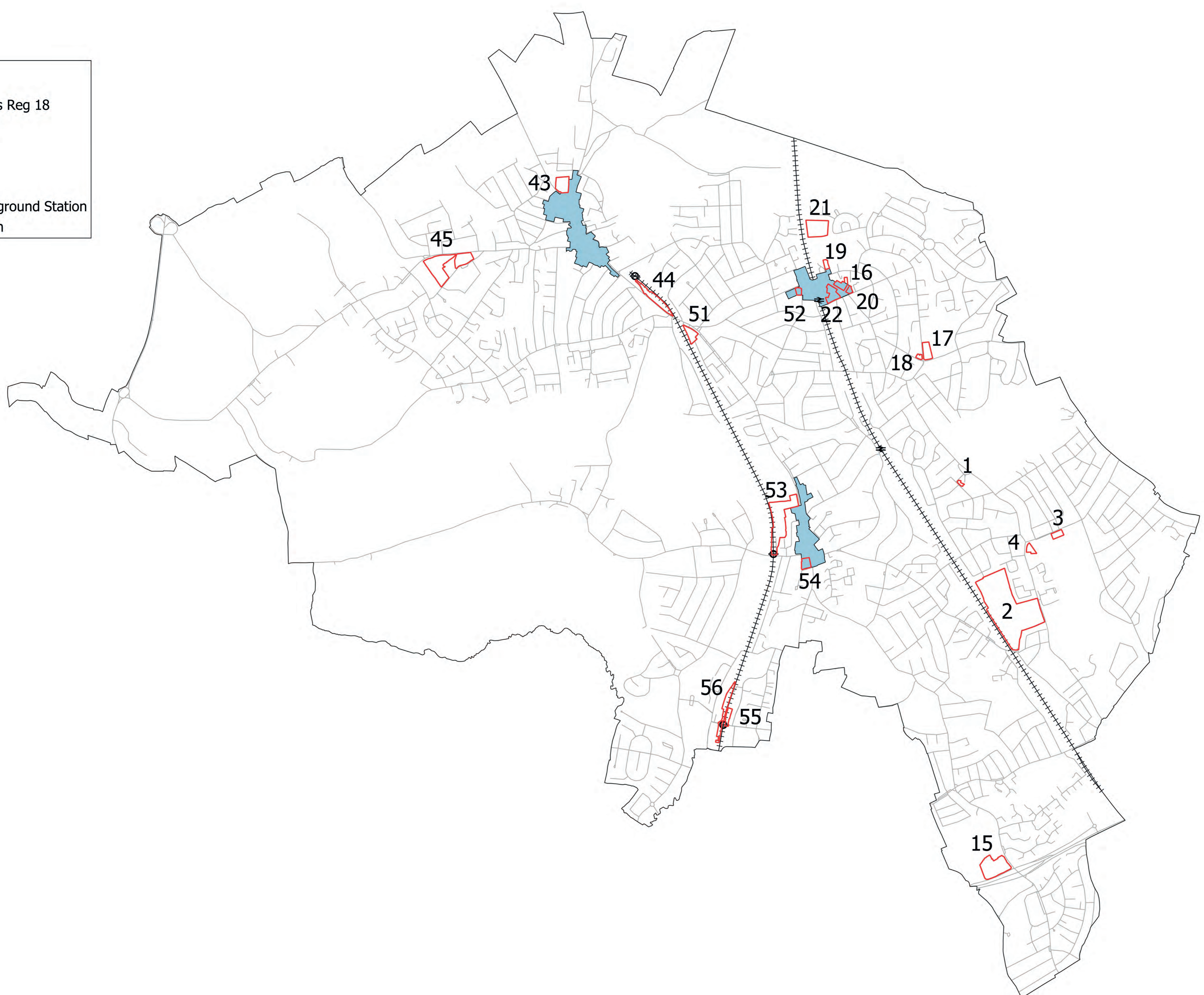
Sites in the area:

There are 21 sites identified for potential redevelopment within the area, including High Barnet and Woodside Park Station carparks, North London Business Park and Allum Way.

Town Centres in the area:

High Barnet, New Barnet, Whetstone and East Barnet these could all experience an increase in the number of homes in the town centre and on the periphery. The New Southgate Opportunity Area is also situated within the area.

Key	
	Site Allocations Reg 18
	Town Centres
	Road
	Train Lines
	Rail Stations
●	London Underground Station
■	Railway Station



Site No	Site Name	Ward	Indicative Residential Unit Numbers	Non-residential Uses
1	Church Farm Leisure Centre	Brunswick Park	12	-
2	North London Business Park	Brunswick Park	1,000	A school, multi-use sports pitch, employment and associated car parking.
3	Osidge Lane Community Halls	Brunswick Park	16	75% community uses, school access and retained parking
4	Osidge Library & Health Centre	Brunswick Park	16	50% replacement library and health centre
15	Tesco Coppets Centre	Coppetts	397	25% mixed uses (retail, community uses and car parking).
16	45-69 East Barnet Rd	East Barnet	110	30% mixed uses (retail and office)
17	Danegrove Primary School Field	East Barnet	148	-
18	East Barnet Library	East Barnet	12	50% community use
19	East Barnet Shooting Club	East Barnet	43	-
20	Fayer's Building Yard & Church	East Barnet	25	30% re-provision of community use

Site No	Site Name	Ward	Indicative Residential Unit Numbers	Non-residential Uses
21	New Barnet Gasholder	East Barnet	190	10% community use
22	Sainsburys East Barnet Rd	East Barnet	199	25% mixed uses (retail, B1 uses and car parking).
43	Army Reserve Depot	High Barnet	193	10% mixed uses (community and office)
44	High Barnet Station	High Barnet	292	25% mixed uses (public car parking and employment).
45	Whalebones Park	High Barnet	149	10% mixed uses (community uses and local green space)
51	Great North Road Local Centre	Oakleigh	84	60% mixed uses (cinema and public house)
52	Kingmaker House	Oakleigh	61	10% office use
53	Allum Way	Totteridge	888	20% mixed uses (office, B1c, community and car parking)
54	Barnet House	Totteridge	139	10% community and office use
55	Woodside Park station East	Totteridge	95	20% re-provision of car parking
56	Woodside Park Station West	Totteridge	356	-

Hendon

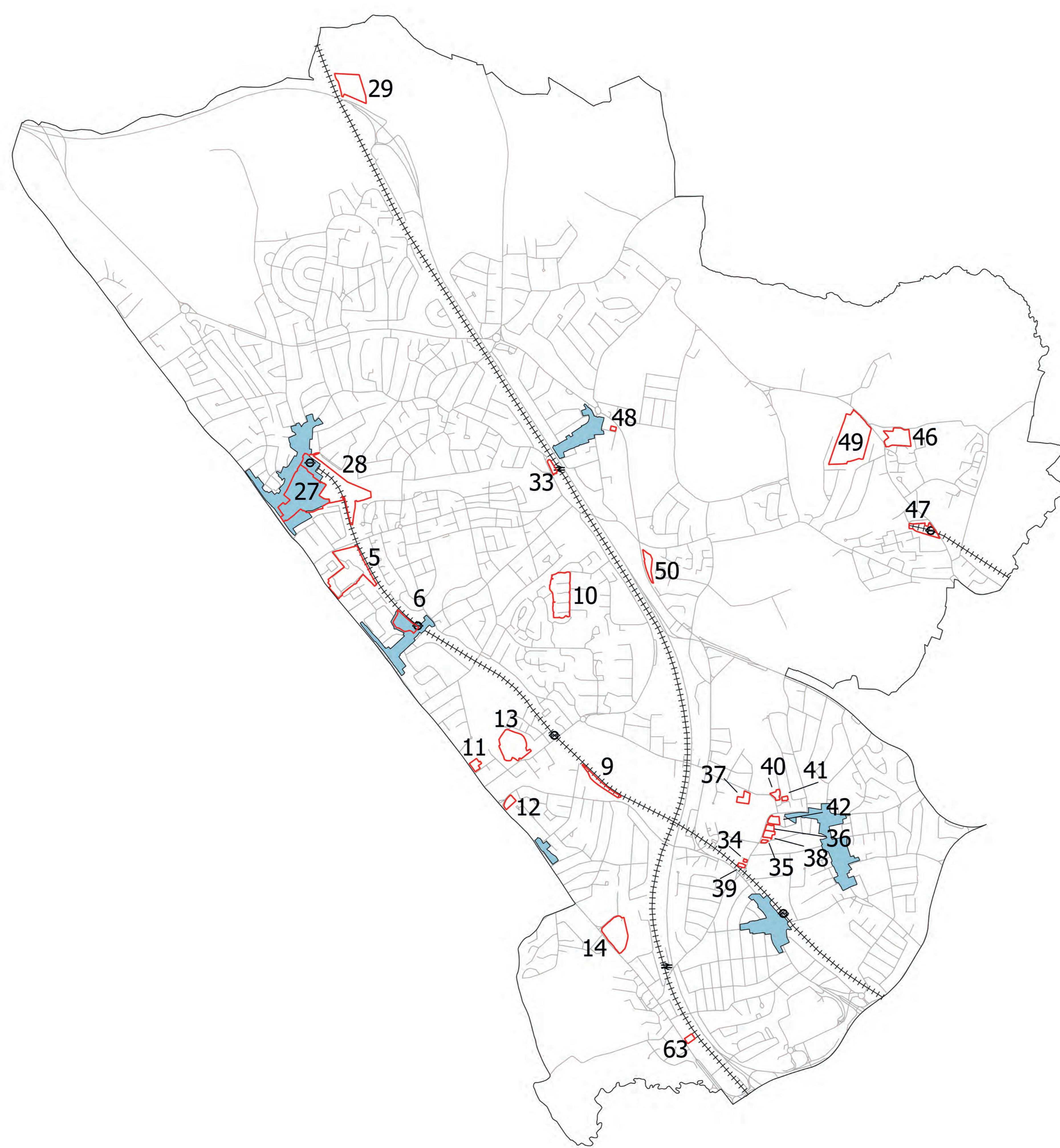
Sites in the area:

There are 27 sites identified for potential redevelopment within the area, including Brent Cross and Brent Cross West, sites along the A5, Edgware Hospital, and IBSA House and Watchtower House on the Ridgeway.

Town Centres in the area:

Edgware, Burnt Oak, Colindale- the Hyde, Hendon, Brent Street and Mill Hill. These could all experience an increase in the number of homes in the town centre and on the periphery. Colindale Opportunity Area is also situated within the area.

Key	
 	Site Allocations Reg 18
 	Town Centres
	Road
	Train Lines
Rail Stations	
	London Underground Station
	Railway Station



Site No	Site Name	Ward	Indicative Residential Unit Numbers	Non-residential Uses
5	Edgware Hospital	Burnt Oak	366	25% hospital continuing in use, with associated car parking
6	Watling Avenue Carpark & Market	Burnt Oak	229	40% mixed uses (station building, retail and car parking)
9	Colindeep Lane (adjacent to Northern Line)	Colindale	138	-
10	Douglas Bader Park Estate	Colindale	200	Small quantum of community uses and retail
11	KFC/ Burger King Restaurant	Colindale	162	10% A3 to A5 uses
12	McDonald's Restaurant	Colindale	175	10% A3 to A5 uses
13	Public Health England	Colindale	1,020	5% community uses
14	Sainsburys The Hyde	Colindale	1,309	25% mixed uses (retail, car parking and community)
27	Edgware Town Centre	Edgware	2379	25% retail, office, leisure and community
28	Edgware Underground & Bus Stations	Edgware	2317	30% mixed uses (transport, retail, office and community)
29	Scratchwood Quarry	Edgware	-	Waste management
33	Bunns Lane Carpark	Hale	43	50% mixed uses comprising hotel and, re-provision of car parking

Site No	Site Name	Ward	Indicative Residential Unit Numbers	Non-residential Uses
34	Burroughs Gardens Carpark	Hendon	9	-
35	Egerton Gardens Carpark	Hendon	23	-
36	Fenella	Hendon	60	10% educational uses.
37	Middlesex University Carpark	Hendon	70	25% for retained replacement car parking
38	Ravensfield House	Hendon	84	10% educational uses.
39	The Burroughs Carpark	Hendon	21	-
40	Meritage Centre	Hendon	36	25% retained community uses
41	PDSA & Fuller St Carpark	Hendon	16	65% retained community uses and housing.
42	Usher Hall	Hendon	39	-
46	IBSA House	Mill Hill	125	20% B1 uses
47	Mill Hill East Station	Mill Hill	127	40% mixed uses (retained rail infrastructure, car parking)
48	Mill Hill Library	Mill Hill	19	50% community uses
49	Watchtower House & Kingdom Hall	Mill Hill	219	60% retained open Green Belt and community uses
50	Watford Way & Bunns Lane	Mill Hill	105	-
63	Philex House	West Hendon	48	-

Regulation 19 FAQs



Frequently Asked Questions

Draft Local Plan (Regulation 19) Publication (June 2021)

Question	Response
General	
What is a Local Plan?	<p>A Local Plan is a borough-wide plan produced by the local planning authority setting out the vision and aspirations for the future of an area. It is comprised of planning policies and proposals specifying the individual sites or areas which are considered appropriate for development as well as those which should be protected. It is an important document that will have a major influence on how the local area will change, develop, look and feel in the future.</p> <p>Barnet’s Local Plan has been produced in consultation with local people and other organisations whose activities influence or are affected by what happens across the Borough. It identifies the number of new homes and jobs required to meet local needs over the next 15 years and where development should take place to accommodate growth. The Local Plan is helping to guide and shape Barnet up until 2036.</p> <p>The Local Plan sets out the level, distribution and density of growth. The Plan also stipulates areas of the Borough, (e.g. those designated as Green Belt and Metropolitan Open Land), that must be protected from development, as well as including a suite of policies to be used to assess any future planning applications that come forward.</p>
Why does the London Borough of Barnet need to produce a new Local Plan?	<p>The Government requires all councils to have an adopted up-to-date local development plan in place by December 2023. It is a necessary and key part of creating a robust planning framework to support the future development of the Borough. Without it, the Council would lose the ability to secure and co-ordinate the development and infrastructure that are needed.</p>

The current Barnet Local Plan from 2012 consists of a set of documents used to guide development. The evidence base behind the 2012 Local Plan has become dated. If we were to continue to rely on the current plan, then we would only be able to meet a fraction of the expected housing need in the Borough. This would result in an even more acute shortage of new and affordable homes. Therefore, it is now time to create a new overarching plan that will help shape the way the Borough develops into the mid-2030s, based on up-to-date objective evidence.

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Doesn't Barnet already have a Local Plan?

Yes. The Council's current Local Plan comprises the Core Strategy (2012) and Development Plan Policies (2012). The policies in these documents are still in force but since the revised National Planning Policy Framework (NPPF) was published in July 2019 some are now out of date. We therefore now need to develop an up-to-date Local Plan to meet Barnet's future potential, planning for the next 15+ years up until 2036.

How often should a plan be reviewed?

To be effective, plans must be kept up-to-date. The NPPF states policies in local plans and spatial development strategies such as the London Plan should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary.

What weight does an emerging Local Plan carry in decision-making?

The NPPF states that decision-makers may give weight to relevant policies in emerging plans according to their stage of preparation, the extent to which there are unresolved objections to relevant policies, and their degree of consistency with policies in the NPPF.

I thought the Mayor of London had recently produced a planning document.

The Mayor's London Plan was published in March this year (2021) and provides an overarching planning policy framework for the capital. All London Boroughs are then responsible for preparing Local Plans for their own areas that need to take account of the Mayor's London Plan and be in "general conformity" with what it says. Barnet's draft Local Plan has therefore been prepared to be in general conformity with the policies in the London Plan (2021).

What role does the London Plan play?	<p>The London Plan sets Borough level housing targets and identifies locations for future growth along with strategic policies for delivering the identified growth.</p> <p>London Boroughs are required to consult with the Mayor at different stages in the production of their Local Plan documents and other documents.</p>
The Government is about to radically overhaul the planning system – especially local plans – so aren't you wasting your time producing this old-style plan?	<p>No. Although the Government issued a radical set of proposals last August 2020 in its Planning for the Future consultation White Paper, and included a Planning Bill in the Queen's Speech in May 2021, little is known of the detail in terms of how and when this will affect the production and content of local plans. It is also likely to take several years before any changes take full effect as, in addition to the Act itself, Government will also need to produce a raft of secondary legislation as well as substantially revise the existing planning guidance set out in the NPPF and online PPG.</p> <p>Meanwhile, Barnet's existing Local Plan is now nearly ten years old and, working under the current system, all local authorities are required to have an up to date Local Plan in place by December 2023 at the latest. Therefore, Barnet cannot afford to just sit back and wait for if and when a new planning system and format for local plans is introduced.</p>
What about the impact of COVID-19 ?	<p>The shadow cast by the COVID-19 pandemic and the rapid changes to how people live, learn, work and travel has had a major impact. Many of these changes have wide-ranging and long reaching consequences and it is likely that many of these could remain in the medium to long term, extending some way into the lifetime of the Local Plan.</p> <p>A new section on the response to COVID-19 is set out in Chapter 2 of the Local Plan. This covers issues including getting the economy going again, improving access to open space, supporting active travel and delivering good quality homes.</p>
What account is being taken of the recent revisions made to the Use Classes Order – in particular the introduction of the new 'E' for everything use class?	<p>Since we consulted in early 2020 on the Preferred Approach (Reg 18) Local Plan the Government has made a number of significant changes to the Use Classes Order. These have the potential to have wide reaching consequences in many areas, including within Barnet's town centres. The principal changes involve the introduction of a new use class E (Commercial, Business and Services) which covers</p>

a wide range of uses including retail, food, offices and light industrial uses, where it is no longer necessary to obtain planning permission when switching between uses. Such changes are down to permitted development. Another significant revision due to take effect from August this year (2021) will similarly allow existing shops and offices to be converted to residential uses through permitted development without requiring the need to first obtain planning permission. Local Plan policies reflect that with greater permissiveness there is a need for the Council to focus on managing and safeguarding commercial uses in Barnet's town centres and employment areas, relying more on non-planning interventions.

Consultation and next steps

What are we consulting on now?

In early 2020 we consulted on the Preferred Approach Local Plan (Regulation 18). We are grateful for the large number of helpful and well considered comments that we received about the Preferred Approach. We have carefully considered these responses in producing this Local Plan document, commonly referred to as the Regulation 19 publication draft, and which represents the second stage in the Local Plan Process.

The Council considers that this version of the Local Plan – together with supporting evidence base - is now ready to go forward for independent examination by a Government appointed planning inspector. Before it does so however we are inviting representations on the Local Plan as well as the evidence that underpins it.

The formal six week period for representations will start on Monday 28th **June 2021 and run until Monday 9th August 2021**. During this time, interested parties and stakeholders may make comments, also known as 'representations', on the draft plan.

Following the end of the six-week representations period, all responses received will then be forwarded onto the Planning Inspectorate to take into account, together with the Local Plan itself and the supporting evidence base documents. The draft Local Plan document and all the supporting documents can be

	found on the Council's website at: https://engage.barnet.gov.uk/
You consulted about this last year so why are you are doing it again?	The Council follows good practice by giving the public and other interested parties the opportunity to comment at various stages in the development of the new Local Plan. The previous consultation on the Local Plan in 2020 sought views on the preferred options that the Council wanted to pursue. We have since taken account of responses received, revised the plan accordingly and produced this version that the Council wants adopted as the future planning framework for Barnet. However, before that can happen, we need to give everyone another opportunity to comment and then for these representations to be considered alongside the plan and supporting evidence, by a Planning Inspector appointed by the Government.
I responded to the previous draft plan surely the Inspector can look at those comments and I needn't write again?	Unfortunately, not. The Council has revised the Reg 18 draft plan that you and others may have commented on previously. In many cases revisions made were in direct response to representations. In order to make representations it is necessary to look at the Regulation 19 Draft Local Plan. The Inspector is only sent responses made to the Regulation 19 Draft Local Plan and this also affords the right to request to present evidence orally at one or more of the hearing sessions that the planning inspector once appointed will arrange as part of the examination process.
Where can I view the Local Plan documents?	The Reg 19 publication stage draft Local Plan and accompanying documents are available to view at: <ul style="list-style-type: none">• local libraries (details and opening hours available at https://www.barnet.gov.uk/libraries/library-opening-times)• online at https://engage.barnet.gov.uk/
Are there any public events about the draft Local Plan?	Yes. Due to COVID19 restrictions these will be held online. The Planning Policy Team will be giving a presentation on the Publication Local Plan on the following dates. These online events will be supported by an independent facilitator. Thursday 8th July between 6pm and 7.30pm Wednesday 21st July between 6pm and 7.30pm

Thursday 5th August between 6pm and 7.30pm

These events are open to anyone.

Who can comment?

The opportunity for making representations is open to everybody. The Council encourages all local residents and stakeholders to comment on the proposed modifications to the Local Plan and to ensure that then submit their representations within the allotted timeframe.

How can I comment on the draft Local Plan?

Comments can be made the following ways:

- In writing using the standard proforma produced by the Planning Inspectorate via Planning Policy Team, sending responses to 7th Floor, 2 Bristol Avenue, Colindale, London, NW9 4EW or respond by email to forward.planning@barnet.gov.uk.
- Comments can also be submitted online via the Barnet Engage website (<https://engage.barnet.gov.uk/>)

Further information is also available through Planning Enquiries on 020 8359 3000
When making your comments, please clearly state which policy or section of the plan that you are referring to and, if objecting, where possible suggest an alternative form of wording that would address your concerns or specific additions / deletions from the draft plan.

Written Representations about the Local Plan must be submitted by one of the methods specified above no later than 11.59 on Monday 9th August 2021. **It is very important to ensure that this deadline is adhered to as failure to do so is likely to mean that your representations cannot be considered by the Inspector and you will not be able to participate in the Examination in Public.** This is because the inspector is only able to consider comments that are 'duly made' i.e. received within the period allowed on this draft of the plan.

I commented on the previous consultation draft but how can I tell whether you took any notice of what I said?

The Council has produced a Schedule of Representations and Responses to the Regulation 18 Local Plan. This records all the representations received to the previous draft plan, who made the comment and importantly how the Council has responded to each of the comments made.

Elsewhere in the table, the Council notes and welcomes supportive comments received. Where a decision has been taken not to make changes to the plan in the light of the comment received this is stated together with the reason(s) given as to why this is the case. The Council has also published a Consultation Report that sets out the engagement activities that were carried out to publicise the Regulation 18 Local Plan.

What about digital exclusion ? How can people without access to internet or email respond?

We realise that not everyone has access to or is comfortable using the internet. Hard copies are available in Barnet’s libraries. Contact the Policy team through 0208 359 3000 or write to them and they will provide assistance.

How long is this all going to take?

Preparing a new Local Plan takes time. Apart from the fact that we need to collect lots of information (‘evidence’) to justify the policies and proposals that the plan contains, we also need to allow time for local people and other organisations to have their say. There are also Regulations setting out a number of stages and timescales with which we have to comply.

What is the timetable for the Local Plan?

Having consulted on the Preferred Approach (Reg 18) Local Plan last year (January – March 2020) we have produced this revised draft Plan (Reg 19) which the Council intends to submit for independent examination and then subject to any modifications advised by the Inspector, ultimately adopted to replace the current Local Plan documents.

The current timetable for completion of the remaining preparation stages of the Local Plan is set out below:

Key Stages	Date
Reg 19: Publication of Local Plan and Consultation	June 2021
Reg 22: Submission	Autumn 2021
Reg 24: Examination in Public	Winter / Spring 2022
Reg 25 Publication of Inspector’s Report	Summer 2022
Reg 26: Adoption	Autumn 2022

Evidence Base

What does the evidence include and why is it necessary?

The Council's evidence base is comprised of a suite of documents produced to support and justify the policies and proposals in the Reg 19 Draft Local Plan.

An Integrated Impact Assessment (comprising of Sustainability Appraisal (SA), Habitats Regulation Assessment (HRA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA)) and Infrastructure Delivery Plan have been published and are available for review and comment.

Whilst we recognise that a number of these are detailed and fairly technical documents, we have tried to make them as concise as possible to help ensure that the evidence is as easily accessible as possible.

The evidence base will continue to be updated, and if necessary added to, as the Local Plan progresses onwards towards the submission and examination stages.

Where can I view the evidence to support the Draft Local Plan?

Supporting evidence can be found on our website: <https://www.barnet.gov.uk/planning-and-building/planning-policies-and-local-plan/local-plan-review/local-plan-evidence-and>

Why are you not considering building in the Green Belt?

Our approach continues to focus new development within the built up areas through the re-use of brownfield or previously developed land. We also need to safeguard existing land for employment uses to help support the local economy and provide space for businesses to grow.

There is still room within our existing town centres and the surrounding built up areas to provide sufficient land to accommodate the amount of growth that we are planning for. Through high-quality design, it is possible to achieve higher densities than is currently the case. To do so represents a much more sustainable option than developing on Barnet's greenspaces.

What is important is that we build the right types and scale of development in the right places and in so doing ensure that all new development is achieved in the most sustainable and attractive way possible.

Content of the draft Plan

How many new homes will be built as a result of the new plan?

The Local Plan will help protect the existing housing stock while also providing the basis for new homes to be delivered to meet the needs of the growing population. In accordance with the London Plan, we anticipate a need to plan for at least 2,364 new homes per year, in Barnet over the plan period up until 2036. New homes will be delivered in the most sustainable locations that are capable of accommodating growth and is supported by appropriate infrastructure.

Didn't household projections recently indicate a reduced level of housing need in Barnet?

Hasn't the Government said authorities need to use a standard method to calculate their housing numbers?

The Government (MHCLG) introduced a Standard Method for calculating local authorities' housing needs, based on national population and household forecasts. Since its introduction in 2018 the algorithm behind the Standard Method has been revised several times and housing requirements have gone up and down. The national housing target of 300,000 new homes per annum has remained unchanged. London boroughs are not directly subject to the MHCLG's standard method's local housing need figures as the recently published London Plan (March 2021) sets their housing targets.

The Government signed off the London Plan in 2021. The local housing need uplift will, therefore, only be applicable once the London Plan is subject to review. . The next London Plan will be required to redistribute to the London boroughs the numbers created by the Government's Standardised Method and whatever algorithm is being used at that time.

Where have the housing need numbers come from and why do they keep going up?

The rate of housebuilding has not matched housing need. This is a national problem and there is a range of well documented reasons for this. Barnet's population has been increasing with people living longer, birth rates exceeding death rates and more people moving into the Borough than leaving it. Changes to how people live their lives also affect the need for homes. For example, if more people live on their own rather than as couples or families this will change the number and types of homes that are needed. The housing need figure reflects those changes. It's too early to say what the impact of COVID19 will be on London's demographic growth. The next round of demographic projections will provide a better insight.

The historic backlog of housing need plus demographic growth makes the housing requirement go up.

How will the Local Plan help meet affordable housing needs?

The London Plan sets the Londonwide context for the delivery of affordable housing in that 50% of all new homes will be affordable. Within that context Barnet will seek a minimum of 35% as affordable accommodation. This will be a mixture of homes for rent and forms of affordable home ownership.

Why are you planning for more houses than you need?

Each year the Council must demonstrate that it has planned or granted planning permission for enough houses to meet housing needs for the next five years. If the Council cannot demonstrate a five year housing supply it is more exposed to development in unwanted areas as refusal decisions on planning applications are challenged at Planning Appeal and overturned by the Planning Inspectorate. The draft local plan shows that it can deliver more new homes than the minimum housing target. This provides flexibility to account for any unexpected issues with delivering sites and ensure there are enough homes in the pipeline to meet the Borough's needs and maintain the five-year housing land supply.

How do we ensure that these new homes actually meet housing need?

The Plan sets out space requirements on the size of homes. It also sets out dwelling size priorities. It protects family housing from conversion and sets out policy for managing vacant homes as well as short-term lets. It sets out a clearer approach on housing options for older people. It also has policy on student accommodation and HMOs. The Plan supports wider housing choice. However, the planning system does not control who lives in these new dwellings. Most housebuilding is dominated by major housebuilders and houses for sale. The Government and Mayor of London is keen to support smaller housebuilders and different forms of tenure in order to diversify the market and speed up build out rates.

Will more homes lead to more congestion in the Borough?

Levels of car ownership in Barnet are high but attitudes are changing particularly among younger residents. Car sharing schemes have become more popular as have more active and sustainable forms of transport such as walking, cycling and public transport. The draft Local Plan recognises that the car is an important travel options for parts of the Borough where alternative options such as public transport is more limited and we have developed policy to reflect this. The Local Plan also seeks to improve its management of residential car parking

and aims to tackle inefficient use of land created by surface level car parking.

In addition, the draft Local Plan promotes more sustainable travel modes where possible and the delivery of new transport infrastructure to support the travel needs of a growing population.

What impact will COVID19 and Brexit have on housing numbers?

It is generally accepted that the UK is facing a housing crisis, which is partly due to the historic under delivery of houses. The Government wants to build 300,000 new homes every year and has much higher expectations of housing delivery in Barnet.

The next London Plan and Barnet Local Plan will reflect the results of the 2021 Census. Household projections may change because of Brexit and the longer term impacts of the COVID 19 pandemic.

What about infrastructure? Barnet's existing services can't cope with existing demand and pressures. We need new GP surgeries, schools, public transport services and higher quality utility provision.

The Local Plan is not just about new homes and jobs; we also need a range of infrastructure to support growth including schools, GPs, public transport, roads, utilities, parks and leisure facilities. The Plan set out what infrastructure provision is needed when new homes are being built and the application of the plan's policies will ensure that the necessary infrastructure is provided when and where it is needed to support growth.

This infrastructure is supported to mitigate new growth. It is capital expenditure for new or improved facilities. It is not intended to pay for new nurses or teachers or compensate for historic cuts to public spending. National taxation is the main source of funding for such essential services.

The Local Plan is underpinned by supporting evidence - including an updated Infrastructure Delivery Plan (IDP). The IDP provides an assessment of current infrastructure provision, future needs, gaps and deficits, along with an indication of costs of providing infrastructure. It ensures infrastructure requirements are fully taken into account when preparing the plan and that all the necessary infrastructure providers are involved in the plan preparation process. The IDP therefore clearly sets out the details of the what infrastructure provision needed to ensure that it is provided in a timely manner.

How will the new infrastructure identified be funded?	<p>One of main mechanisms for ensuring or contributing to the delivery of infrastructure that will be required to support new development is via the Community Infrastructure Levy (CIL).</p> <p>CIL is a planning charge that Local Authorities and the Mayor of London can set on new development to help pay for community infrastructure. It is intended to offer transparency, consistency and fairness for all developers and local authorities, whilst keeping a balance between the cost of funding infrastructure and the viability of development.</p> <p>Most development is subject to pay the Community Infrastructure Levy. The Barnet CIL Charging Schedule is currently being revised</p>
Will the Local Plan help stop town centre decline?	<p>Town centres are a major focus for this Plan and the Council. We want to attract inward investment into these places acknowledging that they remain important centres for commercial, leisure and community uses as well as providing new homes. Making town centres thriving, attractive and safe places where people want to work, rest and play is a priority for the Plan. Investment in food and drink uses is set to increase as is the evening economy.</p>
Will the Plan do anything to help mitigate and adapt to climate change?	<p>The Council is on a credible path to achieving net zero emissions. The Council uses planning policy and guidance produced by the Mayor of London to make London a zero-carbon city by 2050. We have existing guidance on sustainable design and construction from 2016 which we will revisit following adoption of this Plan.</p> <p>The Plan is addressing the inefficient use of land created by surface level car parking. More is done to promote active and sustainable travel; car free development may be appropriate in areas with good public transport access. Growth is focused in the most sustainable locations with good public transport connections.</p>
What does the new Local Plan mean for any neighbourhood plans produced in Barnet either now or in the future?	<p>Neighbourhood planning is an important part the Government's effort to devolve decision-making down to local communities, so they have a greater say in issues that affect them. Neighbourhood plans, once finalised, form part of the statutory plan. They can include general planning policies and design</p>

codes for the development and use of land in an area and can also allocate sites for development.

Currently, only West Finchley is actively progressing the production of a neighbourhood plan which, subject to a confirmatory referendum on July 8th, is expected to be adopted this autumn.

Any neighbourhood plans produced need to be consistent with national planning policy as well as the Mayor's London Plan and the Council's latest adopted plan. Once a neighbourhood plan comes into force the policies it contains take precedence over existing non-strategic policies in the Local Plan covering the neighbourhood area if the event of there being any conflicts. Equally, once our new Local Plan is adopted, there will be scope for any neighbourhood plans to reflect our new strategic priorities for the Borough.

Sites

Why is council-owned land included when the future of those sites has not yet been properly consulted on and agreed?

Prior to identifying for redevelopment any Council owned land and other assets in the draft Local Plan, the decisions taken regarding how these will be used in the future will have been made having carefully considered. As part of this all viable options were looked at and we also listened to any views expressed by the community.

It is important, as part of the plan-led system, that any potential development opportunities are highlighted in the Local Plan at this stage. This then provides certainty about not only the locations chosen but also what form and quantum of development is likely to be considered accepted, and so guides future planning applications that come forward on individual sites.

How have proposed sites for new housing and other uses been selected?

The Council has used a thorough process to identify the proposed housing and other uses land allocations set out in the draft Local Plan. Further details can be found in the Site Selection Background and Sustainability Appraisal documents that form part of the supporting evidence base. These sites have been submitted by landowners and their selection for inclusion in the Reg 19 Draft Plan reflects an extensive information gathering and assessment process. We consider these sites to be developable. Based on this work we have set out principles of development. On this basis, we would expect a

	planning application to come forward with more detail.
Will the sites chosen automatically get planning permission?	No, any planning application to develop a site will be subject to the relevant planning procedures and assessed accordingly.

Regulation 19 Summary

Appendix C – Letters sent to stakeholders

Letter 1 – Sent to all stakeholders on the Council’s database – Regulation 18 Consultations

Dear Stakeholder,

The Council is reviewing and updating the Borough’s planning policies in a document, known as the Local Plan. The Local Plan sets out a vision for how Barnet will change as a place over the next 15 years and forms a strategy which emphasises the Borough’s attractiveness as a place to live, work and visit. The emerging Plan will, when it replaces the existing 2012 Local Plan, provide the main basis upon which future planning applications will be determined.

The Council is undertaking consultation on this draft Local Plan and welcomes your input on a document which will have an impact on the people who live, work, operate a business or visit the Borough as well as future generations.

This document sets out the Council’s preferred policy approach. The Council is inviting comments on this approach.

Consultation Details

The seven week consultation period will run from **27 January to 16 March 2020**.

Barnet’s Draft Local Plan and accompanying documents can be viewed online at:

- Planning Consultation page - <https://www.barnet.gov.uk/planning-and-building/planning-consultations>
- Engage Barnet - <https://engage.barnet.gov.uk/>

Reference copies of the draft Local Plan and accompanying documents are available at the following locations:

- London Borough of Barnet Planning Reception, 2 Bristol Avenue, Colindale, London, NW9 4EW
- Local libraries (check <https://www.barnet.gov.uk/libraries/library-opening-times> for library opening times)

Consultation Responses

Any comments (known as representations) should be made using the questionnaire available online (<https://engage.barnet.gov.uk/>) You are encouraged to use the questionnaire or structure of the questionnaire to comment. In commenting you can let us know how the Local Plan should be changed. Alternatively, representations can also be submitted by using the following methods:

- By post to: Planning Policy Team, 7th Floor, 2 Bristol Avenue, Colindale, London, NW9 4EW
- By email to: forward.planning@barnet.gov.uk

Any representations must be submitted before midnight **16 March 2020**.

Consultation Events

The Planning Policy Team will be giving a short presentation on the draft Local Plan on the following dates. This will be followed by a drop-in session to discuss with planners the Local Plan and sites that are proposed for development in the Schedule of Proposals. These consultation events will largely focus on sites that are within the wards listed below:

- St. Paul's Finchley, N3 2PU (Wednesday 5th February 6.30-8.00pm) – 19 sites from wards of Childs Hill, East Finchley, Finchley Church End, Garden Suburb, Golders Green, West Finchley and Woodhouse
- Colindale Offices, NW9 4EW (Monday 10th February 6.30-8.00pm) – 27 sites from wards of Burnt Oak, Colindale, Edgware, Hale, Hendon, Mill Hill and West Hendon
- Barnet House, N20 0EJ (Tuesday 11th February 6.30-8.00pm) – 21 sites from wards of Brunswick Park, Coppetts, East Barnet, High Barnet, Oakleigh, Totteridge and Underhill

The Planning Policy Team will also be presenting the draft Local Plan at the Resident's Forum meetings held on 4th March 2020 7.00-10.00pm:

- Chipping Barnet Resident's Forum – (Chipping Barnet Library)
- Finchley and Golders Green Resident's Forum – (Church End Library)
- Hendon Resident's Forum – (Hendon Town Hall)

Further information is available from the Planning Policy Team on 020 8359 3000 or forward.planning@barnet.gov.uk.

Finally, please note that you have been contacted as a registered consultee with Barnet Council's Forward Planning consultation database. Should you not wish to be contacted by the Council in relation to planning policy matters in future please email forward.planning@barnet.gov.uk to be removed from the database.

Yours faithfully

Nick Lynch - Planning Policy Manager

Letter 2 – posted to all addresses within 100m of proposed sites – Regulation 18 consultation

Strategic Planning,
London Borough of Barnet
2 Bristol Avenue
Colindale
NW9 4EW

Contact: Planning Policy Team
Tel: 020-8359-3000
E-mail: forward.planning@barnet.gov.uk
Date: Jan 2020
Our Ref: Local Plan Reg 18 2020

Dear Consultee

I am notifying you of a site in Barnet's draft Local Plan in which you may have an interest.

The Council is reviewing and updating Barnet's Local Plan. The Local Plan will run to 2036 and will provide the main basis for determining planning applications.

The Local Plan includes a Schedule of Site Proposals which identifies those sites that the Council is proposing as suitable for development over the next 15 years.

We are notifying you of this consultation by letter because the above address has been identified as being in proximity to one or more of these sites.

You can view the site and the proposed uses, and submit comments, online at:

- Engage Barnet - <https://engage.barnet.gov.uk/>, or
- Planning Consultation page - <https://www.barnet.gov.uk/planning-and-building/planning-consultations>

Printed copies of the draft Local Plan and Schedule of Site Proposals can be viewed at the following locations:

- Local libraries (check <https://www.barnet.gov.uk/libraries/library-opening-times> for library opening times)
- London Borough of Barnet Planning Reception, 2 Bristol Avenue, Colindale, London, NW9 4EW

Drop-in sessions are being held around the borough if you would like to discuss a site with the Planning Policy Team:

- St Paul's Finchley (Wednesday 5th February 6.30-8.00pm) – covering wards Childs Hill, East Finchley, Finchley Church End, Garden Suburb, Golders Green, West Finchley and Woodhouse

- Colindale Offices (Monday 10th February 6.30-8.00pm) – covering wards Burnt Oak, Colindale, Edgware, Hale, Hendon, Mill Hill and West Hendon
- Barnet House (Tuesday 11th February 6.30-8.00pm) – covering wards Brunswick Park, Coppetts, East Barnet, High Barnet, Oakleigh, Totteridge and Underhill

The Planning Policy Team will also be present at the Resident's Forum meetings held on 4th March 2020 7.00-10.00pm at the following locations:

- Chipping Barnet Resident's Forum – (Chipping Barnet Library)
- Finchley and Golders Green Resident's Forum – (Church End Library)
- Hendon Resident's Forum – (Hendon Town Hall)

Any comments should be made in writing using the questionnaire available online (<https://engage.barnet.gov.uk/>), or can be submitted:

- By post: Planning Policy Team, 7th Floor, 2 Bristol Avenue, Colindale, London, NW9 4EW
- By email: forward.planning@barnet.gov.uk

You can make comments until **midnight 16 March 2020**. If we do not hear from you by then we will assume that you have no observations to make.

Yours faithfully

Nick Lynch - Planning Policy Manager

Letter 3 – Sent to all stakeholders on the Council’s database – Regulation 19 Consultation

Dear Consultee

BARNET’S LOCAL PLAN – PUBLICATION (REGULATION 19)

The Council has progressed the Local Plan to the next formal stage known as Regulation 19 (Publication). The Local Plan sets out a vision for how Barnet will change as a place over the next 15 years and forms a strategy which emphasises the Borough’s attractiveness as a place to live, work and visit. The emerging Plan will, when it replaces the existing 2012 Local Plan, provide the main basis upon which future planning applications will be determined.

The Regulation 19 (Publication) Local Plan is the document that will be submitted to the Planning Inspectorate for an Examination in Public to be held by an independent planning inspector. It is this version of the Barnet Local Plan that the Council seeks to adopt, subject to that examination, as the future framework for decision making on planning.

As part of this process the Council now seeks your representations on the ‘soundness’ of the Regulation 19 (Publication) Local Plan.

In accordance with the National Planning Policy Framework to be found sound the Local Plan has to be positively prepared, justified, effective and consistent with national policy.

Representations will be submitted to the Planning Inspectorate for the Examination in Public along with the Local Plan and supporting evidence. It is likely that responses to this regulatory stage will result in further proposed changes to the Plan as part of the Examination in Public process.

The Examination in Public hearing sessions are expected to take place in Spring 2022 and, subject to that examination, adoption of the new Local Plan is not expected until late 2022.

The Council welcomes your input on a document which will have an impact on the people who live, work, operate a business or visit the Borough as well as future generations.

Engagement Details

The period for making responses will run from **28th June to 9th August 2021**.

Barnet’s Publication Local Plan and accompanying documents can be viewed online at:

- Engage Barnet - <https://engage.barnet.gov.uk/>

Reference copies of the Publication Local Plan and accompanying documents are available at the following locations:

- Local libraries (check <https://www.barnet.gov.uk/libraries/library-opening-times> for library opening times)

Representations

Any comments should be made using the Regulation 19 Representation Form available online (<https://engage.barnet.gov.uk/>) Alternatively comments can be submitted following the format of the Regulation 19 Representation Form. All comments must be submitted:

- By post to: Planning Policy Team, 7th Floor, 2 Bristol Avenue, Colindale, London, NW9 4EW
- By email to: forward.planning@barnet.gov.uk

All representations must be received before midnight 9th August 2021.

Please note that further guidance on making representations on soundness is available at <https://engage.barnet.gov.uk/>

Online Engagement Events

The Planning Policy Team will be giving a presentation on the Publication Local Plan on the following dates. These online events will be supported by an independent facilitator.

Thursday 8th July between 6pm and 7.30pm

Wednesday 21st July between 6pm and 7.30pm

Thursday 5th August between 6pm and 7.30pm

Further information is available from the Planning Policy Team on 020 8359 3000 or forward.planning@barnet.gov.uk.

Finally, please note that you have been contacted as a registered consultee with Barnet Council's Forward Planning consultation database. Should you not wish to be contacted by the Council in relation to planning policy matters in future please email forward.planning@barnet.gov.uk or phone 020 8359 3000 to be removed from the database.

Yours faithfully



Nick Lynch - Planning Policy Manager

Letter 4 – posted to all addresses within 100m of proposed sites – Regulation 19 consultation

Strategic Planning,
London Borough of Barnet
2 Bristol Avenue
Colindale
NW9 4EW

Contact: Planning Policy Team

Tel: 020-8359-3000

E-mail: forward.planning@barnet.gov.uk

Date: June 2021

Our Ref: Local Plan Reg 19 2021

Dear Consultee

BARNET'S LOCAL PLAN – PUBLICATION (REGULATION 19)

The Council has progressed the Local Plan to the next formal stage known as Regulation 19 (Publication). The Local Plan sets out a vision for how Barnet will change as a place over the next 15 years and forms a strategy which emphasises the Borough's attractiveness as a place to live, work and visit. The emerging Plan will, when it replaces the existing 2012 Local Plan, provide the main basis upon which future planning applications will be determined.

The Local Plan includes a Schedule of Site Proposals which identifies those sites that the Council is proposing as suitable for development over the next 15 years.

We are notifying about Barnet's Local Plan by letter because the above address has been identified as being in proximity to one or more of the proposals sites in the Local Plan.

Barnet's Publication Local Plan including the site proposals and proposed uses, as well as accompanying documents can be viewed online at:

- Engage Barnet - <https://engage.barnet.gov.uk/>

Reference copies of the Publication Local Plan and Schedule of Site Proposals can be viewed at the following locations:

- Local libraries (check <https://www.barnet.gov.uk/libraries/library-opening-times> for library opening times)

Representations

Any comments should be made using the Regulation 19 Representation Form available online (<https://engage.barnet.gov.uk/>) Alternatively comments can be submitted following the format of the Regulation 19 Representation Form. All comments must be submitted:

- By post to: Planning Policy Team, 7th Floor, 2 Bristol Avenue, Colindale, London, NW9 4EW
- By email to: forward.planning@barnet.gov.uk

Any representations must be received before midnight 9th August 2021.

Please note that further guidance on making representations on soundness is available at <https://engage.barnet.gov.uk/>.

Online Engagement Events

The Planning Policy Team will be giving a presentation on the Publication Local Plan on the following dates. These online events will be supported by an independent facilitator.

Thursday 8th July between 6pm and 7.30pm

Wednesday 21st July between 6pm and 7.30pm

Thursday 5th August between 6pm and 7.30pm

Further information is available from the Planning Policy Team on 020 8359 3000 or forward.planning@barnet.gov.uk.

Yours faithfully



Nick Lynch - Planning Policy Manager

Appendix D – Public notices

Regulation 18 Consultation

Notice and Statement of Draft Local Plan Consultation; Invitation to make Representations Under Planning and Compulsory Purchase Act 2004, Town and Country Planning (Local Development) (England) (Amendment) The Town and Country Planning (Local Planning) (England) Regulations 2012

PUBLIC CONSULTATION 27 JANUARY UNTIL 16 MARCH 2020

Notice is hereby given pursuant to Regulation 18 of the above mentioned Regulations that London Borough of Barnet invites representations on the Local Plan

The Local Plan will be the spatial development plan for Barnet and will set out the Council's vision for a successful place over next 15 years. The Core Strategy and Development Policies will be replaced by the new Local Plan comprising a number of strategic and local policies including site proposals, that sets out the long term spatial vision for Barnet and the strategic policies to deliver the vision. This is the preferred options documents and is required to be publicised to engage with partners, stakeholders, landowners, local residents before the preparation of a publication document and submission to the Secretary of State.

Barnet's Draft Local Plan, accompanying documents and details of borough-wide events and Residents Area Forums can be viewed online at: Planning Consultation page <https://www.barnet.gov.uk/planning-and-building/planning-consultations> ; and Engage Barnet webpage - <https://engage.barnet.gov.uk/>

Reference copies of the draft Local Plan and accompanying documents are available at the following locations:

- London Borough of Barnet Planning Reception, 2 Bristol Avenue, Colindale, London, NW9 4EW
- Local libraries (check <https://www.barnet.gov.uk/libraries/library-opening-times> for library opening times)

Any comments (known as representations) should be made using the questionnaire available online. Alternatively, written representations can also be submitted by using the following methods:

- By post to: Planning Policy Team, 7th Floor, 2 Bristol Avenue, Colindale, London, NW9 4EW
- By email to: forward.planning@barnet.gov.uk

Any representations must be submitted before midnight **16 March 2020**.

Following the period of formal consultation, the Council will consider valid representations and prepare a report summarising the main issues raised and how

they can be addressed in the Local Plan before next consultation on the publication draft takes place in Autumn 2020.

Regulation 19 Consultation

**Notice and Statement of Draft Local Plan Consultation; Invitation to make
Representations
Under
Planning and Compulsory Purchase Act 2004, Town and Country Planning (Local
Development) (England) (Amendment)
The Town and Country Planning (Local Planning) (England) Regulations 2012**

PUBLIC CONSULTATION 28 JUNE UNTIL 9 AUGUST 2021

Notice is hereby given pursuant to Regulation 19 of the above mentioned Regulations that London Borough of Barnet invites representations on the Local Plan.

The Local Plan will be the spatial development plan for Barnet and will set out the Council's vision for a successful place over next 15 years. The Core Strategy and Development Policies will be replaced by the new Local Plan comprising a number of strategic and local policies including site proposals, that sets out the long term spatial vision for Barnet and the strategic policies to deliver the vision. This is the publication stage which will be publicised to engage with partners, stakeholders, landowners, local residents before submission to the Secretary of State.

Barnet's Draft Local Plan, accompanying documents and details of events can be viewed online at Engage Barnet webpage - <https://engage.barnet.gov.uk/>

Reference copies of the draft Local Plan and accompanying documents are available at local libraries (check <https://www.barnet.gov.uk/libraries/library-opening-times> for library opening times)

Any comments (known as representations) should be made using the Regulation 19 Representation Form available at <https://engage.barnet.gov.uk/>, alternatively, comments can be submitted following the format of the Representation Form. Representations must be submitted using the following methods:

- By post to: Planning Policy Team, 7th Floor, 2 Bristol Avenue, Colindale, London, NW9 4EW
- By email to: forward.planning@barnet.gov.uk

Any representations must be submitted before midnight **9 August 2021**.

Representations will be submitted to the Planning Inspectorate for the Examination in Public along with the Local Plan and supporting evidence. The Examination in Public is expected to take place in Spring 2022 and subject to that examination adoption of the new Local Plan is not expected until late 2022.

Appendix E – Consultation Events Feedback - Regulation 18 Consultation

This table provides an overview of all the consultation and engagement events held across the Borough throughout the duration of the seven week consultation period in 2020 on the Regulation 18 Draft Local Plan

Events/Meeting Name & Date	Feedback
<p>Federation of Residents Association (FORAB)</p> <p>15th Jan 7.30-9.30pm Trinity Church, Finchley Central</p>	<p>FORAB welcomed certain policies (extensions, conversions, basements etc) and the site allocations list, and commented that the Council was at least being open and transparent. Concerns were raised with regards to:</p> <ul style="list-style-type: none"> • Housing numbers and sites (why 46,000 new homes as housing target and not the lower number of 31,000 of the London Plan • Concerns about mismatch between housing target and population projections • Dwelling mix policy must safeguard against pocket homes • Want more details of where 46,000 new homes will be delivered • Resolving issues about small sites and infill development. • Tall buildings policy (why so high, also discrepancy in text and policy – exceeding 14 or up to 14). • Extensions policy commendable but need further details on the word “redevelopment” in the policy, it will encourage people to replace one unit with 15 flats, so make it more explicit, can the plan say that it will not only apply to town centres only but to suburbs as well. • Evidence on Employment and Town Centres doesn’t tally with what’s happening in reality, t offices are being converted and secondary frontages being removed so question 67,000 sqm of employment space and 110,000sqm of retail space

	<ul style="list-style-type: none"> • Transport – Rail services and public transport big hole in the doc, future of CPZs in Barnet.. • Concerns about infrastructure provision to support growth. • Site allocations not showing heights, bulk, massing etc (not in line with the London Plan).
<p>Health & Wellbeing Board 16th Jan 9am Hendon Town Hall</p>	<p>A formal response from the Health and Wellbeing Board has been submitted as part of the Reg 18 consultation . The meeting raised the following issues :</p> <ul style="list-style-type: none"> • Access to public drinking water fountains • More support for tackling climate change on existing housing stock. • Why is the provision of wheelchair accessible housing only 10%, and how much of this will be affordable? • How is Barnet as a ‘family friendly’ borough reflected in the policies? • Would like to see support for special needs changing facilities in parks and open spaces. • How is the impact of new development in other boroughs and cross borough infrastructure impact taken into account? • Clarification on working with HMO Licencing
<p>Schools – Directors Briefing to Chairs and Vice-Chairs 22nd January 7pm Hendon Town Hall</p>	<p>Concerns raised about:</p> <ul style="list-style-type: none"> • Cost of affordable housing and provision of keyworker housing – in particular for teachers. • Impact of this level of growth and the timely provision of infrastructure. • Clarification on the existing development pipeline and infrastructure commitments. • Nature of the jobs delivery – what type of employment is expected. • Engagement with young people on the Local Plan. • Specific issues with improved GP premises in Colindale needed to match levels of growth • Specific issue about loss of car parking provision in Lodge Lane Car Park.
<p>Safer Communities Partnership Board</p>	<p>Safer Communities Partnership Board. The meeting raised the following issues :</p> <ul style="list-style-type: none"> • The Plan won’t be adopted until 2021/22 so how can Barnet control planning decisions before then?

<p>24th Jan 9am Hendon Town Hall</p>	<ul style="list-style-type: none"> • The London Plan housing target has been lowered; why not accept this as Barnet’s target instead of the 46k? • Barnet does not have a significant night time economy and should not seek to increase it due to the anti-social problems it would generate. • Police need to be involved in planning applications and new plan planning documents. • Concern over the impact of tall buildings on the borough, repeating mistakes of 1960s and tall building residents developing mental health problems • Is the new housing being provided for local people or to settle new people into the borough? • How to ensure sufficient supporting services are provided, e.g. child nursery places? • Provision of CCTV in new developments can be important for community safety. New developments must avoid negatively affecting the performance of existing CCTV. • Would like there to be a commitment to ensure employment opportunities for ex-offenders.
<p>Federation of Small Businesses monthly Barnet Breakfast 4th Feb 8-10am, The Bohemia</p>	<p>Expressed concerns about car parking provision – especially in North Finchley – and the impact it has on trade. In addition the group also highlighted concerns about the affordability of housing, and quality of the retail offer.</p>
<p>Job Centre Plus Barnet 5th Feb 10am</p>	<p>Expressed concerns about :</p> <ul style="list-style-type: none"> • Loss of car parking around tube stations as staff from Hertfordshire use these station car parks to access central London meetings and training. • Local economy benefits from access to local jobs. • Need to secure S106 contributions for skills and training from development. Welcomed the specific SPD on securing S106. • improvements to transport accessibility. • need for more affordable homes

<p>Boroughwide event (1 of 3) (Finchley and Golders Green Constituency)</p> <p>Wednesday 5th Feb 6-8.30pm (drop-in from 6.30-8pm) St Paul's Church, Finchley</p>	<p>Expressed concerns about :</p> <ul style="list-style-type: none"> • Lack of publicity for this public meeting and the perception that the Council will not listen • Proposals for Finchley Central Station • Development underway at Victoria Park • Conflict of interest from Capita Re in terms of its plan-making role and development management function • Consultation by Barnet planners is actually more thorough than other boroughs • As Council benefits from New Homes Bonus for completions it's driven by numbers • Definition of affordable housing and the split between intermediate and rented • Clarification on affordable rent requirements • If 35% is required for affordable housing, what's the other 65% meant for? • Impact of Brexit on housing numbers – surely they will be reduced • Need more details on jobs numbers • Given the level of growth there should be more retail space • Why can't these policies in particular the one on tall buildings be used to stop Finchley Central development proposals? • Town centres are the most sustainable locations for growth • Clarification on the Mayor's planning powers • Car parking policy is too restrictive • Local List consultation – failed to engage wide enough although Finchley Society was involved • Need to withdraw permitted development rights in order to stop people paving over front gardens • Local Plan can have aspirations – it doesn't have to be set out in another document • More linkages with the Long Term Transport Strategy • Infrastructure delivery does not match growth
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	<ul style="list-style-type: none"> • Greater clarification required on the support available through S106 and CIL.
<p>The Professionals and Young People’s Forum (planning session)</p> <p>7th Feb all day, Colindale</p>	<p>Specific concerns were expressed about :</p> <ul style="list-style-type: none"> • Tall buildings – accept there will be more of them but excessive heights need to be controlled. • Quality of town centres and overall offer from range of shops, options for fast food, places to hang out and leisure and creative activities that are attractive to young people • Safety concerns in parks and town centres highlighted and poor quality of street lighting • Bus services – ease of getting across the Borough • Cycling – more attractive if streets are safer – cycle lanes too narrow
<p>Age UK Barnet -Burnt Oak</p> <p>10th Feb 10.20am-12pm Burnt Oak Library</p>	<ul style="list-style-type: none"> • Highlighted concerns about Engagement with elderly people and what the Local Plan offer was for this group • High housing numbers and the housing target of 46,000 new homes by 2036 • impact of residential conversions in their areas • significant development at Colindale and West Hendon and the tall buildings • housing growth not being matched by increase in number of GPs and hospitals • housing not currently affordable • who these houses were for and why they are so unaffordable • car parking impacts from recently built schools • role of Barnet Homes in the Local Plan • Knock on effects for residential streets from removing car-parking at tube stations
<p>Boroughwide event (2 of 3) (Hendon Constituency)</p> <p>Monday 10th Feb 6-8.30pm (drop-in from 6.30-8pm) Colindale offices</p>	<p>Concerns raised about:</p> <ul style="list-style-type: none"> • Why can’t Plan say more about design and building beautiful? • Capacity of Colindale to take more growth – it sounds as if the Plan wants 46,000 new homes in Colindale • Precedent set by the proposed Colindale Station development for height and densification • Infrastructure delivery has not matched growth • Capacity of Colindale Station to handle growth

	<ul style="list-style-type: none"> • Lack of transport modelling behind growth • Lack of public provision of car parking spaces in Colindale • Colindale Library sign points the wrong way • Why 46,000 new homes when there are only going to be 60,000 more people by 2036? • What's the average household size in the Borough? • How is the Plan addressing the problem of overcrowded households? • Proposed development to Bunns Lane Car Park – concerns about overspill car parking • People need to park to get into London otherwise they will drive all the way in • Need for Step free access at Mill Hill Broadway station • Object to development at Site 9 - Colindeep Lane and impact on biodiversity • Impact of Council / Middlesex University proposals in Hendon • Students added to local GP lists in Hendon increasing waiting times for local residents • Studentification in Hendon • Car parking policy is too restrictive • Greater clarification required on the support available through S106 and CIL.
<p>Boroughwide event (3 of 3) (Chipping Barnet Constituency –</p> <p>Tuesday 11th Feb 6-8.30pm (drop-in from 6.30- 8pm) Barnet House</p>	<p>Concerns raised about:</p> <ul style="list-style-type: none"> • Council spending cuts especially in terms of cuts to Libraries • Enforcement powers to be used on industrial uses at Oakleigh Road South • Proposed development at High Barnet Station • Displaced car parking from station development • Clarification on NLBP proposals • Servicing issues on residential infill sites • Council needs a more joined up approach on parking management • The borough of Barnet not just the neighbourhood • Car parking policy is too restrictive • Opportunities for basement parking should be supported

	<ul style="list-style-type: none"> • Greater clarification required on the support available through S106 and CIL – want to know more on how it is spent • How to object to the Local Plan • Commenting on the Integrated Impact Assessment • Addressing space requirements of sports clubs.
<p>Age UK Barnet - Edgware 13th Feb 2.15-3.30pm Edgware Library</p>	<p>Expressed concerns about :</p> <ul style="list-style-type: none"> • Officers drafting the plan are not from the Council but Re, the commercial organisation of Capita granting applications for their own vested interests. • Social infrastructure i.e. GP/Hospitals waiting times, • Tall buildings and mental health issues, • Why is Edgware getting more high rises and shops closing down? • No public toilets in Edgware town centre, • No sufficient social infrastructure generated by development at Spur Road or at Colindale.Edgware will be just the same. • Where is the new infrastructure to accompany the new homes being proposed? • The Council has very poor customer service. No evidence that they listen..
<p>Children and Young People’s Board 13th February 2020 at 4.30pm at NLBP</p>	<p>Highlighted the following issues :</p> <ul style="list-style-type: none"> • Utilise the child poverty report from Barnet; latest Autism Strategy; • Children’s survey from 2019 highlights knife crime and how young people fear walking in dark due to no lights or badly designed buildings and alleyways. • Failure to cover infrastructure provision especially schools. • Sites densities were criticised for being unrealistic. • The Board requested a separate session on areas related to children and young people’s needs .
<p>CommuniTY Barnet- the Hub Connections 20th Feb at , 10am</p>	<p>Highlighted the following :</p> <ul style="list-style-type: none"> • Issue of trust with the Council and ability to respond to the concerns of residents. An example of this is the green waste collection consultation • lack of provision for affordable housing that is really affordable

<p>Meritage Centre in Hendon</p>	<ul style="list-style-type: none"> • health and wellbeing needs to be sufficiently supported in the Local Plan.
<p>Barnet Multi Faith Forum Thursday 20th Feb at 9.30am at Trinity Church Colindale</p>	<p>Raised concerns about:</p> <ul style="list-style-type: none"> • Community meeting place provision as part of infrastructure delivery • The Plan should not just consider faith groups in terms of their contribution to community cohesion. Faith groups have a wider role to play • Plan needs to reflect the religious diversity of the Borough in setting the context • Greater clarification required on the support available through S106 and CIL.
<p>MENCAP Barnet Monday 24th February 3.45-5.15pm</p>	<p>Highlighted concerns about :</p> <ul style="list-style-type: none"> • Access to Freedom Passes and Blue Badges is more restrictive. Dial-a-Ride now requires payment. The freedom to travel around the Borough is becoming harder which reduces opportunities particularly in terms of work • an increase in vandalism in the Borough • Feeling vulnerable and unsafe, especially at night, as residential streets are not well lit and need brighter street lights • Concerns around affordable housing and access to supported housing in the borough as well as support workers to facilitate this access • Ensuring that green spaces can continue to be enjoyed • difficult to get across the borough on public transport • Emphasised the importance of having spaces such as t community centres to meet friends and places for activity clubs especially for art
<p>Langley Park Residents' Association and Mill Hill Resident's Association Monday 24th February 7-8.30pm Colindale Offices</p>	<p>Concerns raised about:</p> <ul style="list-style-type: none"> • Provision for biodiversity including bats and targets for tree planting • Delivery and size of family homes • Protect the openness of the Green Belt and the principle of just using footprints • Application of residential space standards • High densities not appropriate on the Ridgeway • More details on future of Mill Hill Neighbourhood Plan • Powers of Mayor of London and Secretary of State in terms of Pentavia and NIMR • Future of the draft London Plan for decision making • How is the Local Plan going to mitigate climate change?

	<ul style="list-style-type: none"> • Existing household sizes and household projections – how do they justify growth? • Partingdale Lane power station – can this be a Local Plan proposal? • Council’s housebuilding programme – why aren’t the Council building more new homes? • Provision in terms of charging points for electric cars • Protecting the Green Belt – • Provision of GPs to match growth – CCG should not be priced out of premises such as at Millbrook Park • Council needs a more joined up and rigorous approach on parking management • People are not going to stop using their cars – problems are just displaced • Local residents also use station car parks • Concerns about proposal wording at Edgware Hospital and Watchtower • Application of car parking standards needs to reflect blue badge holders and consider impact of topography – Bittacy Hill does not encourage cyclists and pedestrians travelling from Mill Hill East station to National Institute for Medical Research development. • Capacity of Mill Hill East Station not matching growth especially with services cut • Displacement of car parking into residential streets from Bunns Lane Car Park – more design parameters in particular on height required • What’s the justification for a hotel – visitors will need car parking
<p>Friern Barnet and Whetstone Residents Association (FBWRA)</p> <p>27th Feb 7.30pm-9.30pm St John Parish Church, Finchley</p>	<p>Concerns raised about:</p> <ul style="list-style-type: none"> • High rise living not suitable for families • Delivery and size of family homes • Residential space requirements including storage space – in comparison to Parker Morris standards • Application of residential space standards • Need to pitch the Plan as the least worst option • Tall buildings proposals repeating past mistakes • More details on proposals for NLBP, in particular the impact on the geese

	<ul style="list-style-type: none"> • Council gets New Homes Bonus for completions • Why bother producing a Local Plan given the powers of Mayor of London and Secretary of State? • Provision for Gypsies and Travellers • How is the Plan going to deliver zero carbon? • Do libraries form part of the infrastructure? • Existing household sizes and household projections – how do they justify growth? • Why isn't the Meadow Works a proposal? • Council's housebuilding programme – why aren't the Council building more? • Provision in terms of charging points for electric cars • Support for protecting the Green Belt • Provision of GPs to match growth • Council needs a more joined up and rigorous approach on parking management • People are not going to stop using their cars • Local residents also use station car parks • There is behaviour change amongst younger residents in terms of car ownership and usage • Apps make public transport easier to use. • Station car park development just sends the problem further down the line • Displacement of car parking space from schemes at Coppetts Tesco and Great North Leisure Park
<p>Barnet Youth Board Thursday 27 February 5.30-7.30pm Colindale</p>	<p>Discussions focused on :</p> <ul style="list-style-type: none"> • Quality of town centres in particular the public realm and the retail offer. More youth themed leisure activities. There is a need for young people to feel welcomed in town centres rather than as a nuisance. • Transport in particular bus services and the info available at bus stops • Street lighting and safety particularly in town centres • Flood risk is increasing across the Borough • What is the Council doing about the climate emergency ?

<p>Edgware Town Centre Town Team Invitation</p> <p>2nd March at 6.30pm at St Margaret's Church, 1 Station Road Edgware HA8 7JE</p>	<p>Concerns raised about:</p> <ul style="list-style-type: none">• Previous Council plans in particular the 2013 Town Centre Framework have not led to change in Edgware Town Centre. Why will this be any different?• The impact of building heights, especially tall buildings, on the character of the surrounding area and on neighbour amenity.• How many new residents will there be in 5,000 new homes – what quality of life will new residents have?• A new residential development adjacent to Edgware Primary School has led to overlooking into the playground and cigarette butts being dropped into the school property.• Concerns about anti-social behaviour across the town centre• Lack of public toilets in town centre• Loss of car parking for town centre users.• Provision of disabled spaces• Impact on rent levels – will increased number of new homes help with affordability• Development without parking spaces leading to overspill onto surrounding residential roads.• State of the environment, particularly to the rear of the shopping centre and on the pathways leading past Edgware Primary School.• The state of the Railway Hotel (a local landmark and Grade II listed building). Want to see it repaired and brought back into use.• Too much traffic and congestion on the main roads through the area.• Pollution levels affecting residents, particularly for new residential blocks on major roads.• Edgware hospital site being redeveloped as they want the hospital to stay and for car parking to carry on being provided.• The effect of additional residents putting pressure on education, medical and transport services.• Sale of the Broadwalk Centre and what the new owner might mean for the future of Edgware.
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	<ul style="list-style-type: none"> • Maintaining Edgware’s shops and shopping centre. • Capacity of Underground and Thameslink questioned • A41 and A1 should be shown on Key Diagram
<p>Area Forums (1 of 3) Chipping Barnet Residents Forum</p> <p>4th March 7-10pm Barnet Library</p>	<p>Concerns raised: Evidence on Gypsies and Travellers not considered robust, the plan/evidence base should be updated.</p> <ul style="list-style-type: none"> • development of 46,000 homes will change Barnet’s character. North London Business Park highlighted as an example of unpopular development • Considerable concern around infrastructure provision and the impact that so many new homes will have on this. • Housing numbers will not stack up. Population projections maybe wrong or the housing number is. People felt that there more evidence needed from the Council on this. • Too many homes based on incorrect figures / population projections • More efforts needed to reach out to people and get them engaged. • Need to separate the planning process from the political process. • Local councillor highlighted that development on station car parks was crazy as people needed to park cars to get to work. Removing car parks at stations runs the risk that people will park in nearby streets / residential areas which creates a new set of problems. • Local councillor highlighted that although not considered a planning matter action is required in terms of rights of access in terms of freeholder rights / building in gardens. • Clarifications requested on definition of Affordable housing
<p>Area Forum (2 of 3) Finchley and Golders Green Residents Forum</p> <p>Venue: Church End Library, 4th March 7-10pm</p>	<p>Concerns raised about:</p> <ul style="list-style-type: none"> • The impact of building heights, especially tall buildings, on the character of the surrounding area and on neighbour amenity. Especially concerned about the height of proposals in Cricklewood, including on the B&Q site, and on the Lodge Lane car park site in North Finchley. • The effect of additional residents putting pressure on education, medical and transport services. • Council allowing NHS locations to be redeveloped for other uses.

	<ul style="list-style-type: none"> • Cricklewood’ used as a ‘dumping ground’ for development. • Perceived lack of coordination with adjoining boroughs, especially LB Brent. • Is affordable housing really affordable? • Whether the Local Plan goes far enough in seeking to tackle climate change. • Impact of waste transfer vehicles on quality of life in Cricklewood. • What kind of uses can S106 and CIL money be used for to support areas affected by new development?
<p>Area Forums (3 of 3) Hendon Residents Forum</p> <p>4th March 7-10pm Hendon Town Hall</p>	<p>Highlighted concerns about :</p> <ul style="list-style-type: none"> • Proposals by Middlesex University to deliver new student accommodation • How the University and its students have destroyed the community • Council favours the University over the local community • Altercations between residents and students over parking in residential streets. Want more robust car parking controls i.e. CPZ to be put in place. • Crime and anti-social behaviour – with a thriving student focused drugs market operating in the streets around the University – alleyways off Edgerton Gardens were specifically mentioned. • Residents feel less safe as a consequence and don’t consider the police response to be adequate. • The residents do not want more student housing in the area.

Appendix F - Online survey

**Barnet Council's
Draft Local Plan
(Reg 18) Preferred Approach
Consultation**

27 January 2020 – 16 March 2020
Consultation Questionnaire

Introduction

The Council is reviewing and updating the Borough's planning policies in a document, known as the Local Plan. The Local Plan sets out a vision for how Barnet will change as a place over the next 15 years and forms a strategy which emphasises the Borough's attractiveness as a place to live, work and visit. The emerging Plan will, when it replaces the existing 2012 Local Plan, provide the main basis upon which future planning applications will be determined.

The Council is undertaking consultation on this draft Local Plan and welcomes your input on a document which will have an impact on the people who live, work, operate a business or visit the Borough as well as future generations.

Thank you for your time - your participation in this important consultation is greatly appreciated.

Further information is available from the Planning Policy team at forward.planning@barnet.gov.uk or on 020 8359 3000.

How to Provide Your Views

Please take the time to read the draft Local Plan before completing this questionnaire.

The draft Local Plan and accompanying documents can be viewed online at:

- Engage Barnet - <https://engage.barnet.gov.uk/>

Reference copies of the draft Local Plan and accompanying documents are available at the following locations:

- London Borough of Barnet Planning Reception, 2 Bristol Avenue, Colindale, London, NW9 4EW (Monday, Wednesday and Friday, 9am– 1pm)
- Local libraries (check <https://www.barnet.gov.uk/libraries/library-opening-times> for library opening times)

Completed questionnaires can be sent to the council by:

- Emailing – forward.planning@barnet.gov.uk
- Posting – Planning Policy Team, 7th Floor, 2 Bristol Avenue, Colindale, London, NW9 4EW

Data Protection and Confidentiality

The council does not collect personal information in this questionnaire, which means the information you provide is anonymous. We do not ask for your name, address, email address, telephone number, full post code or any other information that would allow us to identify you. The information you choose to give us in the equalities questions is also anonymous so we cannot identify you from it.

Since the data we collect is anonymous, it is not considered to be personal data under data protection legislation (such as the General Data Protection Regulation or the Data Protection Act 2018).

You can read more about Barnet's privacy statement here: www.barnet.gov.uk/privacy. If you have any questions about this statement please email first.contact@barnet.gov.uk.

How to Complete this Questionnaire

We have tried to make this questionnaire as easy as possible to complete.

The questionnaire is in chapter order and asks for comments on each chapter of the draft Local Plan. We have provided a summary of the chapter at the beginning of each section but please do take the time to read the whole chapter before commenting. Details of where to view the draft Local Plan can be found in the above section on 'How to Provide Your Views'.

If you do find you need more space to write your comments, please include additional pages with this questionnaire indicating which question you are commenting on. Alternatively, please email your comments to forward.planning@barnet.gov.uk

We really value your views. The questionnaire will take approximately thirty minutes to complete.

Section 1: Chapter 1 - Introduction

This chapter provides an overview of the Local Plan document, its relationship to other plans, policies and strategies, and the Local Plan timetable.

1. Do you want to comment on Chapter 1 - Introduction? (Please tick one option only)

- Yes Go to Q 2
No Go to Section 3, Q 3

Section 2: Chapter 1 - Introduction (Continued)

2. Do you have any comments on the Introduction? (Please type in your comments)

Section 3: Chapter 2 – Challenges and Opportunities

This Chapter provides an overview of Barnet and sets out the challenges and opportunities it faces.

Chapter 2 – Challenges and Opportunities is available to be viewed [here](#).

3. Do you want to comment on Chapter 2 – Challenges and Opportunities? (Please tick one option only)

- Yes Go to Q 4
No Go to Section 5, Q 5

Section 4: Chapter 2 – Challenges and Opportunities (Continued)

4. Do you have any comments on the Challenges and Opportunities? (Please type in your comments)

Section 5: Chapter 3 – Barnet’s Vision and Objectives

This Chapter sets out Barnet’s vision. The vision forms the heart of the Local Plan. Upon this vision there are a series of key objectives that underpin the 51 policies in the Local Plan. This Chapter also sets out the preferred strategy to meet the challenges Barnet faces and shows this through the Key Diagram.

Chapter 3 – Barnet’s Vision and Objectives is available to be viewed [here](#).

5. Do you want to comment on Chapter 3 – Barnet’s Vision and Objectives? (Please tick one option only)

- Yes Go to Q 6
No Go to Section 7, Q 9

Section 6: Chapter 3 – Barnet’s Vision and Objectives (Continued)

6. To what extent do you agree or disagree with the Vision and Objectives? (Please tick one option only)

Strongly agree	<input type="checkbox"/>
Tend to agree	<input type="checkbox"/>
Neither agree nor disagree	<input type="checkbox"/>
Tend to disagree	<input type="checkbox"/>
Strongly disagree	<input type="checkbox"/>
Don't know / not sure	<input type="checkbox"/>

7. Please give reasons why you agree or disagree with our Vision and Objectives? (Please type in your comments)

8. Do you have any comments on Barnet's Spatial Strategy (BSS01) or the Alternative Options for BSS01? (Please type in your comments)

Section 7: Chapter 4 – Growth and Spatial Strategy

This Chapter sets out Barnet's growth requirements together with a suite of 13 strategic policies that seek to deliver this growth. These strategic policies form the spine of the Local Plan.

- Policy GSS01 Delivering Sustainable Growth
- Policy GSS02 Brent Cross Growth Area
- Policy GSS03 Brent Cross West Growth Area
- Policy GSS04 Cricklewood Growth Area
- Policy GSS05 Edgware Growth Area
- Policy GSS06 Colindale Growth Area
- Policy GSS07 Mill Hill East
- Policy GSS08 Barnet's Town Centres
- Policy GSS09 Existing & Major New Transport Infrastructure
- Policy GSS10 Estate Renewal
- Policy GSS11 Major Thoroughfares
- Policy GSS12 Car Parks

Policy GSS13 Strategic Parks and Recreation

Chapter 4 – Growth and Spatial Strategy is available to be viewed [here](#).

9. Do you want to comment on Chapter 4 – Growth and Spatial Strategy?
(Please tick one option only)

- Yes Go to Q 10
No Go to Section 9, Q 12

Section 8: Chapter 4 – Growth and Spatial Strategy (Continued)

10. Do you have any comments on the policies in the Growth and Spatial Strategy Chapter ? Please highlight the policy you are commenting on (Please type in your answer)

11. Do you have any comments on the Alternative Options for Growth and Spatial Strategy ? (Please type in your comments)

Section 9: Chapter 5 - Housing

This Chapter sets out how the Local Plan will respond to a changing population, building new homes to widen choice and housing options, ensuring access to affordable, good quality housing as well as protecting existing stock. The Local Plan’s approach to housing is set out in a suite of seven policies as follows:

- | | |
|--------------|---|
| Policy HOU01 | Affordable Housing |
| Policy HOU02 | Housing Mix |
| Policy HOU03 | Residential Conversions |
| Policy HOU04 | Specialist Housing |
| Policy HOU05 | Efficient Use of Barnet’s Housing Stock |
| Policy HOU06 | Meeting Other Housing Needs |

Policy HOU07 Gypsies, Travellers and Travelling Showpeople

Chapter 5 – Housing is available to be viewed [here](#).

12. Do you want to comment on Chapter 5 - Housing? (Please tick one option only)

- Yes Go to Q 13
No Go to Section 11, Q 15

Section 10: Chapter 5 - Housing (Continued)

13. Do you have any comments on the policies in the Housing Chapter? Please highlight the policy you are commenting on (Please type in your answer)

14. Do you have any comments on the Alternative Options for Housing? (Please type in your comments)

Section 11: Chapter 6 – Character, Design and Heritage

This Chapter sets parameters for managing change ensuring positive benefits of growth and that Barnet does not lose the qualities that attract people to live, work and visit the Borough. An appropriate balance must be struck which involves new development responding to existing character, appearance and scale. This is set out in a suite of nine policies as follows:

- | | |
|--------------|----------------------------------|
| Policy CDH01 | Promoting High Quality Design |
| Policy CDH02 | Sustainable and Inclusive Design |
| Policy CDH03 | Public Realm |

Policy CDH04	Tall Buildings
Policy CDH05	Extensions
Policy CDH06	Basements
Policy CDH07	Amenity Space and Landscaping
Policy CDH08	Barnet's Heritage
Policy CDH09	Advertisements

Chapter 6 – Character, Design and Heritage is available to be viewed [here](#).

15. Do you want to comment on Chapter 6 – Character, Design and Heritage?
(Please tick one option only)

- Yes Go to Q 16
No Go to Section 13, Q 18

Section 12: Chapter 6 – Character, Design and Heritage (Continued)

16. Do you have any comments on the policies in the Character, Design and Heritage Chapter? Please highlight the policy you are commenting on
(Please type in your answer)

17. Do you have any comments on the Alternative Options for Character, Design and Heritage? (Please type in your comments)

Section 13: Chapter 7 – Town Centres

This Chapter sets out how town centres, local centres and parades can adapt to a changing commercial environment, helping such locations move away from the traditional shopping format to provide a wider range of uses and innovative spaces. The Local Plan approach to town centres is set out in a suite of four policies as follows:

Policy TOW01	Vibrant Town Centres
Policy TOW02	Development principles in Barnet's Town Centres, Local Centres and Parades
Policy TOW03	Managing Clustering of Town Centre Uses
Policy TOW04	Night –Time Economy

Chapter 7 – Town Centres is available to be viewed [here](#).

18. Do you want to comment on Chapter 7 – Town Centres? (Please tick one option only)

- Yes Go to Q 19
No Go to Section 15, Q 21

Section 14: Chapter 7 – Town Centres (Continued)

19. Do you have any comments on the policies in the Town Centres Chapter? Please highlight the policy you are commenting on (Please type in your answer)

20. Do you have any comments on the Alternative Options for Town Centres? (Please type in your comments)

Section 15: Chapter 8 – Community Uses, Health and Wellbeing

This Chapter sets out how in responding to population change the Local Plan can promote healthier lives for residents and help deliver new social infrastructure in more accessible locations such as town centres which are more capable of serving local needs. The Local Plan approach to community uses, health and wellbeing is set out in a suite of four policies as follows. (Policy CHW03 was moved to the Growth and Spatial Strategy Chapter)

Policy CHW01	Community Infrastructure
Policy CHW02	Promoting health and wellbeing
Policy CHW04	Making Barnet a safer place
Policy CHW05	Protecting Public Houses

Chapter 8 – Community Uses, Health and Wellbeing is available to be viewed [here](#).

21. Do you want to comment on Chapter 8 – Community Uses, Health and Wellbeing? (Please tick one option only)

- Yes Go to Q 22
No Go to Section 17, Q 24

Section 16: Chapter 8 – Community Uses, Health and Wellbeing (Continued)

22. Do you have any comments on the policies in the Community Uses, Health and Wellbeing Chapter? Please highlight the policy you are commenting on (Please type in your answer)

23. Do you have any comments on the Alternative Options for Community Uses, Health and Wellbeing? (Please type in your comments)

Section 17: Chapter 9 - Economy

This Chapter sets out how the Local Plan can help to provide the conditions that modern businesses are seeking and thereby foster an economically sustainable place where residents have access to local jobs and services. The Local Plan approach on the economy is set out in a suite of three policies as follows:

Policy ECY01	A Vibrant Local Economy
Policy ECY02	Affordable Workspace
Policy ECY03	Local Jobs, Skills and Training

Chapter 9 - Economy is available to be viewed [here](#).

24. Do you want to comment on Chapter 9 - Economy? (Please tick one option only)

- Yes Go to Q 25
No Go to Section 19, Q 27

Section 18: Chapter 9 - Economy (Continued)

25. Do you have any comments on the policies in the Economy Chapter? Please highlight the policy you are commenting on (Please type in your answer)

26. Do you have any comments on the Alternative Options for Economy? (Please type in your comments)

Section 19: Chapter 10 - Environment and Climate Change

This Chapter sets out how through the Local Plan the Council will manage growth to help deliver a clean, pleasant and well-maintained environment as part of its approach to the mitigation of, and adaptation, to climate change. The Local Plan's approach to the Environment and Climate Change is set out in a suite of six policies as follows:

Policy ECC01	Mitigating Climate Change
Policy ECC02	Environmental Considerations
Policy ECC03	Dealing with waste
Policy ECC04	Barnet's Parks and Open Spaces
Policy ECC05	Green Belt and Metropolitan Open Land
Policy ECC06	Biodiversity

Chapter 10 - Environment and Climate Change is available to be viewed [here](#).

27. Do you want to comment on Chapter 10 - Environment and Climate Change? (Please tick one option only)

- Yes Go to Q 28
No Go to Section 21, Q 30

Section 20: Chapter 10 - Environment and Climate Change (Continued)

28. Do you have any comments on the policies in the Environment and Climate Change Chapter? Please highlight the policy you are commenting on (Please type in your answer)

29. Do you have any comments on the Alternative Options for Environment and Climate Change? (Please type in your comments)

Section 21: Chapter 11 – Transport and Communications

This Chapter sets out how the Local Plan is seeking to improve connectivity in terms of sustainable and active travel as well as digital communication while helping to improve air quality and the health of residents. The Local Plan's approach to Transport and Communications is set out in a suite of four policies as follows:

Policy TRC01	Sustainable and Active Travel
Policy TRC02	Transport Infrastructure
Policy TRC03	Parking management
Policy TRC04	Digital Communication and Connectivity

Chapter 11 – Transport and Communications is available to be viewed [here](#).

30. Do you want to comment on Chapter 11 – Transport and Communications?
(Please tick one option only)

- Yes Go to Q 31
No Go to Section 23, Q 33

Section 22: Chapter 11 – Transport and Communications (Continued)

31. Do you have any comments on the policies in the Transport and Communications Chapter? Please highlight the policy you are commenting on (Please type in your answer)

32. Do you have any comments on the Alternative Options for Transport and Communications? (Please type in your comments)

Section 23: Chapter 12 - Delivering the Local Plan

This Chapter explains mechanisms for ensuring the infrastructure to support growth is secured.

Chapter 12 - Delivering the Local Plan is available to be viewed [here](#).

33. Do you want to comment on Chapter 12 - Delivering the Local Plan? (Please tick one option only)

- Yes Go to Q 34
No Go to Section 25, Q
?35

Section 24: Chapter 12 - Delivering the Local Plan (Continued)

34. Do you have any comments on the approach to delivering the Local Plan? (Please type in your answer)

Section 25: The Schedule of Site Proposals

The Schedule of Proposals sets out 67 site proposals from across Barnet. All site proposals have been subject to a rigorous assessment of their suitability as deliverable or developable sites between 2021 and 2036.

The Schedule of Site Proposals is available to be viewed [here](#).

35. Do you want to comment on The Schedule of Site Proposals? (Please tick one option only)

- Yes Go to Q 36
No Go to Section 26 Q 37

Section 25: The Schedule of Site Proposals (Continued)

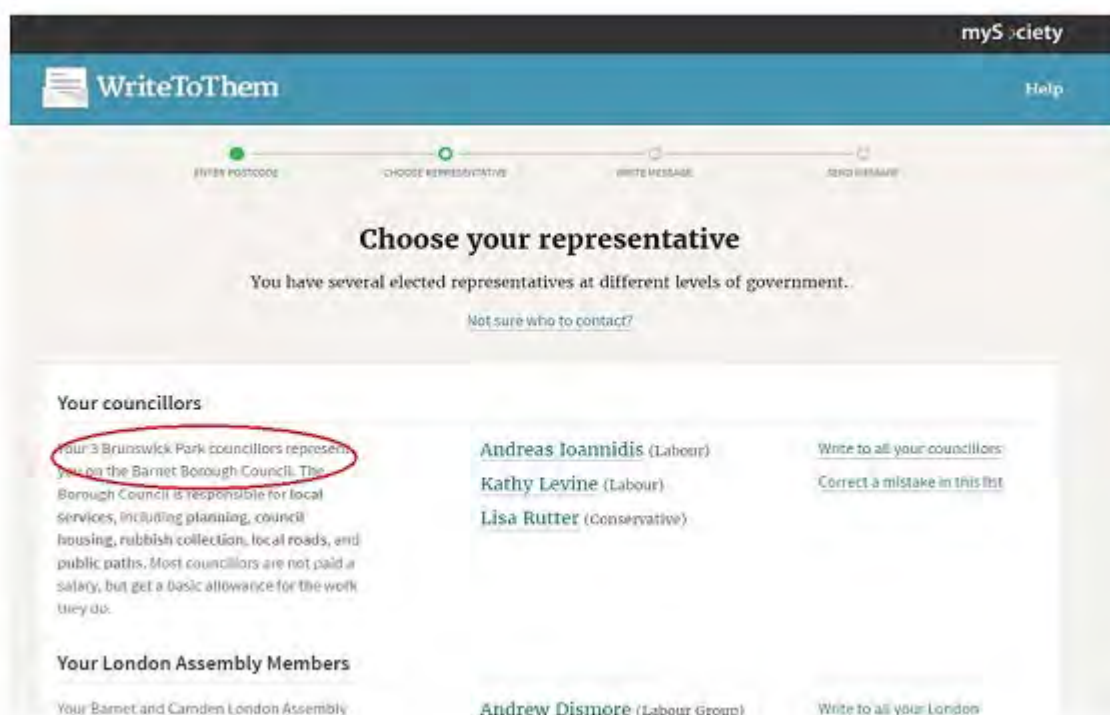
36. Please provide your comments on the Schedule of Sites. Please highlight the proposal site you are commenting on (Please type in your answer)

Section 26: About you

When consulting with our residents and service users Barnet Council needs to understand the views of our different communities.

So that we can analyse the findings by different locations in the borough, please can you provide the Barnet ward that you live in.

If you do not know the Barnet ward that you live in you can find it by visiting <https://www.writetothem.com/> and entering your postcode. You should then see a page like the image below - you will find the name of your ward on the left-hand side of the page under the heading "Your councillors". In this example, the name of the ward is Brunswick Park.



37. Which ward do you live in? If you live outside Barnet please tick other and specify: (Please tick one option only)

Brunswick Park	<input type="checkbox"/>
Burnt Oak	<input type="checkbox"/>
Childs Hill	<input type="checkbox"/>
Colindale	<input type="checkbox"/>
Coppetts	<input type="checkbox"/>
East Barnet	<input type="checkbox"/>
East Finchley	<input type="checkbox"/>
Edgware	<input type="checkbox"/>
Finchley Church End	<input type="checkbox"/>
Garden Suburb	<input type="checkbox"/>
Golders Green	<input type="checkbox"/>

Hale	<input type="checkbox"/>
Hendon	<input type="checkbox"/>
High Barnet	<input type="checkbox"/>
Mill Hill	<input type="checkbox"/>
Oakleigh	<input type="checkbox"/>
Totteridge	<input type="checkbox"/>
Underhill	<input type="checkbox"/>
West Finchley	<input type="checkbox"/>
West Hendon	<input type="checkbox"/>
Woodhouse	<input type="checkbox"/>
Prefer not to say	<input type="checkbox"/>
Other	<input type="checkbox"/>

To help us understand the feedback you give us, please tell us in what capacity you are responding.

38. Are you responding as: (Please tick one option only)

A Barnet resident	<input type="checkbox"/>
A person who works in the London Borough of Barnet area	<input type="checkbox"/>
A Barnet business	<input type="checkbox"/>
Representing a voluntary/community organisation	<input type="checkbox"/>
Representing a public sector organisation	<input type="checkbox"/>
Other	<input type="checkbox"/>

39. Please specify the type of stakeholders or residents your community group or voluntary organisation represents (Please type in your answer)

41. Are you currently employed, self-employed, retired or otherwise not in paid work? (Please tick one option only)

An employee in a full-time job (31 hours or more per week)	<input type="checkbox"/>
An employee in a part time job (Less than 31 hours per week)	<input type="checkbox"/>
Self-employed (full or part-time)	<input type="checkbox"/>

On a Government supported training programme (e.g. Modern Apprenticeship or Training for Work)	<input type="checkbox"/>
In full-time education at school, college or university	<input type="checkbox"/>
Unemployed and available for work	<input type="checkbox"/>
Permanently sick or disabled	<input type="checkbox"/>
Wholly retired from work	<input type="checkbox"/>
Not in work and not available for work, e.g. in a carer role	<input type="checkbox"/>
Prefer not to say	<input type="checkbox"/>
Doing something else	<input type="checkbox"/>

Does your household own or rent your accommodation? (Please tick one option only)

Owned with a mortgage or loan	<input type="checkbox"/>
Owned outright	<input type="checkbox"/>
Other owned	<input type="checkbox"/>
Rented from Council	<input type="checkbox"/>
Rented from a Housing Association or another Registered Social Landlord	<input type="checkbox"/>
Rented from a private landlord	<input type="checkbox"/>
Other rented or living here rent free	<input type="checkbox"/>
Part rent and part mortgage (shared ownership)	<input type="checkbox"/>
Don't know	<input type="checkbox"/>
Prefer not to say	<input type="checkbox"/>

Section 27: Diversity monitoring

The Equality Act 2010 identifies nine protected characteristics: age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation, and requires the council to pay due regard to equalities in eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations between people from different groups. We ask questions about the groups so that we can assess any impact of our services and practices on different groups. The information we collect helps the council to check that our policies and services are fair and accessible.

Collecting this information will help us understand the needs of our different communities and we encourage you to complete the following questions.

All your answers will be treated in confidence and will be stored securely in an anonymous format. All information will be stored in accordance with our responsibilities under the Data Protection Act 1998.

For the purposes of this questionnaire we are asking all the questions regarding the protected characteristics included in the Equality Act 2010.

42. In which age group do you fall? (Please tick one option only)

16-17	<input type="checkbox"/>	55-64	<input type="checkbox"/>
18-24	<input type="checkbox"/>	65-74	<input type="checkbox"/>
25-34	<input type="checkbox"/>	75+	<input type="checkbox"/>
35-44	<input type="checkbox"/>	Prefer not to say	<input type="checkbox"/>
45-54	<input type="checkbox"/>		

43. Are you: (Please tick one option only)

Male	<input type="checkbox"/>	Go to Q 46
Female	<input type="checkbox"/>	Go to Q 45
Prefer not to say	<input type="checkbox"/>	Go to Q 46

If you prefer to use your own term please provide it here: (Please write in your answer)

44. Are you pregnant and/or on maternity leave? (Please tick one option on each row)

	Yes	No	Prefer not to say
I am pregnant	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
I am currently on maternity leave	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

45. Is your gender identity the same as the sex you were registered at birth?

(Please tick one option only)

Yes, it's the same	No, it's different	Prefer not to say
<input type="checkbox"/> Go to Q48	<input type="checkbox"/> Go to Q47	<input type="checkbox"/> Go to Q48

46. If you answered no, please enter the term you use to describe your gender:

(Please type in your answer)

47. What is your ethnic origin? (Please tick one option only)

Asian / Asian British		Other ethnic group	
Bangladeshi	<input type="checkbox"/>	Arab	<input type="checkbox"/>
Chinese	<input type="checkbox"/>	Any other ethnic group (✓ AND WRITE BELOW)	<input type="checkbox"/>
Indian	<input type="checkbox"/>	White	
Pakistani	<input type="checkbox"/>	British	<input type="checkbox"/>
Any other Asian background (✓ AND WRITE BELOW)	<input type="checkbox"/>	Greek / Greek Cypriot	<input type="checkbox"/>
Black / African / Caribbean / Black British		Gypsy or Irish Traveller	<input type="checkbox"/>
African	<input type="checkbox"/>	Irish	<input type="checkbox"/>
British	<input type="checkbox"/>	Turkish / Turkish Cypriot	<input type="checkbox"/>
Caribbean	<input type="checkbox"/>	Any other White background (✓ AND WRITE BELOW)	<input type="checkbox"/>
Any other Black / African / Caribbean background (✓ AND WRITE BELOW)	<input type="checkbox"/>	Prefer not to say	<input type="checkbox"/>
Mixed / Multiple ethnic groups			
White & Asian	<input type="checkbox"/>		
White & Black African	<input type="checkbox"/>		
White & Black Caribbean	<input type="checkbox"/>		
Any other Mixed / Multiple ethnic background (✓ AND WRITE BELOW)	<input type="checkbox"/>		

The Equality Act 2010 defines disability as ‘a physical or mental impairment that has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities’.

In this definition, long-term means more than 12 months and would cover long-term illness such as cancer and HIV or mental health problems.

48. Do you consider that you have a disability as outlined above? (Please tick one option only)

Yes	<input type="checkbox"/>	Go to Q50
No	<input type="checkbox"/>	Go to Q51
Prefer not to say		

49. If you have answered ‘yes’, please select the definition(s) from the list below that best describes your disability/disabilities:

Hearing (such as deaf, partially deaf or hard of hearing)	<input type="checkbox"/>	Reduced Physical Capacity (such as inability to lift, carry or otherwise move everyday objects, debilitating pain and lack of strength, breath energy or stamina, asthma, angina or diabetes)	<input type="checkbox"/>
Vision (such as blind or fractional/partial sight. Does not include people whose visual problems can be corrected by glasses/contact lenses)	<input type="checkbox"/>	Severe Disfigurement	<input type="checkbox"/>
		Learning Difficulties (such as dyslexia)	<input type="checkbox"/>
Speech (such as impairments that can cause communication problems)	<input type="checkbox"/>	Mental Illness (substantial and lasting more than a year, such as severe depression or psychoses)	<input type="checkbox"/>
Mobility (such as wheelchair user, artificial lower limb(s), walking aids, rheumatism or arthritis)	<input type="checkbox"/>	Physical Co-ordination (such as manual dexterity, muscular control, cerebral palsy)	<input type="checkbox"/>
Other disability, please specify			
Prefer not to say <input type="checkbox"/>			

50. What is your religion or belief? (Please tick one option only)

Baha'i	<input type="checkbox"/>	Jain	<input type="checkbox"/>
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Buddhist	<input type="checkbox"/>	Jewish	<input type="checkbox"/>
Christian	<input type="checkbox"/>	Muslim	<input type="checkbox"/>
Hindu	<input type="checkbox"/>	Sikh	<input type="checkbox"/>
Humanist	<input type="checkbox"/>	No Religion	<input type="checkbox"/>
Prefer not to say	<input type="checkbox"/>	Other religion/belief (Please specify)	<input type="checkbox"/>

51. What is your sexual orientation? (Please tick one option only)

Heterosexual	<input type="checkbox"/>	Other	<input type="checkbox"/>
Gay or Lesbian	<input type="checkbox"/>	Prefer not to say	<input type="checkbox"/>
Bisexual	<input type="checkbox"/>		

52. In addition, if you prefer to define your sexuality in terms other than those used above, please let us know below: (Please type in your answer)

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53. What is your marital status? (Please tick one option only)

Single	<input type="checkbox"/>	Widowed	<input type="checkbox"/>
Co-habiting	<input type="checkbox"/>	In a same sex civil partnership	<input type="checkbox"/>
Married	<input type="checkbox"/>	Prefer not to say	<input type="checkbox"/>
Divorced <input type="checkbox"/>	<input type="checkbox"/>		

Thank you for taking part in our questionnaire.

Please return your questionnaire to

**London Borough of Barnet, Planning Policy, 7th Floor, 2 Bristol Avenue,
London, NW9 4EW**

to arrive before **16 March 2020**.

Appendix G – Summary of Main Issues raised at Regulation 18 Stage

This represents LBB officer summaries of the key representations made on the policies and proposals within the Reg 18 Local Plan. Reference should be made to full representations for complete text and context in which the summarised representation was made.

Main policy challenges at Reg 18	
LOCAL PLAN POLICIES	
BARNET'S VISION & OBJECTIVES	<ul style="list-style-type: none"> • Plan needs to be more family friendly • Plan needs to reflect the religious diversity of the Borough in setting the context • Health and wellbeing needs to be sufficiently supported in the Local Plan • Need to pitch the Plan as the least worst option • Why bother producing a Local Plan given the powers of Mayor of London and Secretary of State? • Borough to be MORE AMBITIOUS in part: AIM FOR 2030, not 2050 re Zero Carbon • Challenge is to develop the borough but keep its identity. • How do you plan on supporting 'strong and cohesive communities'? • What about the current residents and what can be done for them whilst also adding to the sense of community? • What will attract new businesses to Barnet town centres? • What is the evidence for the need for more retail space anywhere when so many local shops are empty and businesses are continuing to close? • There are already many empty offices in the Borough. Where will new demand come from?
GROWTH & SPATIAL STRATEGY	<ul style="list-style-type: none"> • Question the justification for the housing target of 46,000 new homes by 2036 – it should be lower in line with London Plan target or it should be higher in line with Standardised Assessment • Support for development at Brent Cross, however, this needs to be properly integrated with surrounding areas. • Mismatch between housing growth, population projections and impact of Brexit • More detail required on distribution of housing growth • Assurances about the timely delivery of infrastructure in particular access to GPs to support such growth • Council benefits from New Homes Bonus for completions showing that the Plan is driven by numbers • Greater clarification required on the support available through S106 and CIL. • Colindale can't take all of Barnet's growth • Colindale needs to improve retail/ leisure offer • Lack of transport modelling behind growth • Previous planning framework for Edgware did not lead to change in Edgware Town Centre. Why will this be any different?

	<ul style="list-style-type: none"> • Concerns about impact of tall buildings on the character of Edgware and on neighbour amenity • Public realm around Brent Cross and Colindale needs to be improved. • More homes in the Borough means more pollution and environmental problems. • Building lots of tall buildings will deter people from living here along with high council tax, high parking charges and high crime rates. • Borough not able to accommodate 46,000 new homes. Housing targets not realistic and ill thought out. Need to build elsewhere. • Identifying and allocating the necessary quantum of land that is appropriate for residential development is crucial, and it is therefore suggested that the Council align with the London Plan small sites target and find any additional sites needed to address the small site shortfall. • The strategy should place a greater emphasis on maximising delivery on land near stations. • The policy appears to hinge primarily on a significant increase in vehicle movements rather than on a principle of reducing reliance on the car • Needs a stronger emphasis on active and sustainable modes of transport. • There should be more explicit support in this policy for the principle of taller buildings and higher densities in the district centres, particularly where they are adjacent to transport hubs or existing clusters of taller buildings. • Developing Brent Cross Shopping Centre is the wrong model as people are less likely to visit the shops and use internet shopping. • Why is the housing trajectory of requirement so uneven ? • It's good to develop and improve Colindale but at the same time this should be proportionate. • Colindale also lacks retail establishments around the tube station or a commercial area. There are no suitable rent spaces for restaurants, bars, etc. Instead of building only social housing try to make a few high-end buildings. This will bring people from other areas spending their social time here. • Colindale must not become a set of building blocks with nothing else around. Colindale also needs sport facilities like swimming pools. • Blocks of unused retail outlets on the high street are by far the best use of land. • Intensifying development in smaller town centres is out of the question. • Building homes with little parking provision is also unacceptable. • Infill building is unacceptable. Building along major thoroughfares to a maximum height of 3 storeys is however acceptable and new homes should be concentrated along these main thoroughfares. • GSS08 needs a statement on preserving the historic aspects of town centres • GSS09 needs a statement on preserving the character of the local area. • GSS11 needs to take account of 'wind tunnel effect' as well as wall-like corridor. • GSS12 needs to take account of local character and the list of local heritage sites.
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	<ul style="list-style-type: none"> • GSS13 is light on detail. • The policies of town centre development looks good • Represents overdevelopment and above the required London Plan targets. • Burnt Oak is cheaper and poorer than some of Barnet's other town centres, but it doesn't come without its charm. If it's gentrified too much, it will become unaffordable. • Brent Cross development seems to be a good idea, so long as locals are not adversely affected. • Plans for town centres are going to lead to over population; not enough facilities for all the people then there is more pollution, noise and possible impact on social behaviour. • Type and scale of new homes which are being built are really not suitable to Barnet.
<p>HOUSING</p>	<ul style="list-style-type: none"> • Size of new homes with regard to application of space standards, dwelling mix requirements and the provision of accommodation suitable for families • Protection of the existing stock of family housing in the Borough with particular regard to managing the conversion and redevelopment of existing houses • Clarification required on affordable rent • Why aren't the Council building more new homes ? • Concerns about the cost of affordable housing and provision of keyworker housing – in particular for teachers • Colindale must not become a cluster of social housing. • Be more ambitious! Plenty of Barnet residents (elderly owners) occupy 3 - 4 bedroom properties, while living alone. Find innovative ways for these owners to rent out their free bedrooms for younger generation. • The majority of new homes that are being built are flats when what people want are small 2-3 bedroom homes with gardens. These are the slums of tomorrow and should not be allowed. • Barnet's current housing stock should be maintained at all costs. many lovely old Victorian houses are being knocked down in order to make space for box-like modern blocks of flats. • There is a great danger of overdevelopment destroying the character of the Borough. • HOU05 - 1 a) should include social use in the list in brackets. • HOU06 - Build to Rent should follow London Plan H13 in full. • Local Plan should include a section on funding housing that recognises the challenge to economic viability of the current model for homebuilding • It is important that the need to build affordable housing in a way that is viable for developers does not lead to approval of tall buildings in locations outside of the growth areas • HOU03 - In criteria a) the distance to a major or district town is not reasonable, a 10-minute walk can be appropriate. • When comparing Barnet's PTAL map the area covered above level 5 is significantly small.

	<ul style="list-style-type: none"> • There should be a specific policy on self-build and other community housing. This might include an exception policy in the Green Belt, as operated by many Councils • Impact on rent levels – will increased number of new homes help with affordability ? • High rise living not suitable for families • Residential space requirements including storage space – in comparison to Parker Morris standards • Clarify provision for Gypsies and Travellers as evidence not considered robust • Clarify that new housing is being provided for local people or to settle new people into Barnet • Clarify how the Plan is addressing the problem of overcrowded households • More support for tackling climate change on existing housing stock. • Why is the provision of wheelchair accessible housing only 10%, and how much of this will be affordable? • Clarification on working with HMO Licencing • Housing policies need to include some text around permitted development rights for homeowners. • Affordable housing targets and mix are a good idea. • When delivering housing for older people, need to ensure that there are suitable transport options available to them close by and important to ensure that development accommodates their specific needs. • For affordable housing, priority should be given to the older residents, disabled residents and key workers living in the Borough for 5 years plus. • Keeping people in their homes rather than specialist accommodation requires greater provision of social services to support them (e.g. home visits, meals on wheels...) • In relation to Policy HOU4 (Specialist Housing), it is recommended that the figure of 275 new specialist older persons homes per annum is replicated in a standalone policy to reflect the clear need for this particular type of housing • Terminology and definitions on affordable housing needs to be clearer under HOU01. • Under policy HOU 03, it is suggested that the wording be strengthened to ensure that there is no significant loss of character or amenity when doing residential conversions. • Important to meet balanced housing stock that meets the needs of all. • A clearer policy approach is needed to identify enough self / custom-build sites to meet the level of need rather than rolling-forward targets onto future Development Plan documents. • HOU01 - Should be updated to reflect the 50% affordable requirement for affordable housing on public sector land and on SIL/LSIS and non-designated industrial sites, in line with Policy H5 in the draft London Plan. • Despite the information presented in the West London Alliance GTNA, there are frequent unauthorised encampments on public and private land in Barnet, and no existing provision within the borough to cater for this obvious need.
<p>CHARACTER, DESIGN & HERITAGE</p>	<ul style="list-style-type: none"> • Too much inconsistency in developments granted planning permission and what is considered acceptable. • Density of new development should be decided on a case- by- case basis according to the character of the area. • Concern that high levels of growth and development would have detrimental impact on the character of the borough.

	<ul style="list-style-type: none"> • Locations selected for tall buildings are not appropriate and need to be reviewed. • Tall buildings should only be allowed along motorways and major thoroughfares. • CDH07 needs to be strengthened as amenity space is usually too small. • CDH05 on extensions denies local people the right to a limited amount of development that will improve homes/ lives. A more flexible approach on this could help accommodate the needs of an ageing population. • CDH04 - should be updated to reflect the height of existing buildings, particularly where the tall buildings are new and form part of area-wide regeneration, as there appears little justification for limiting heights in these circumstances since the principle of very tall buildings has clearly been accepted. • There must be a restriction on the height of the towers proposed to be built at Finchley Central Station. • All approved planning should take into account the landscape and be sympathetic • American style hoardings destroy the character of a place. hoardings such as these are not necessary • Impact of tall buildings particularly in town centre strategic locations identified through the 2012 Local Plan • Repeating mistakes of 1960s and tall building residents developing mental health problems • Excessive heights of tall buildings need to be controlled • Concerns expressed about impact of small site and infill development • Need to withdraw permitted development rights in order to stop people paving over front gardens • Need to say more about design and building beautiful • Signage should be controlled and night-time lighting should meet environmentally sound criteria
<p>TOWN CENTRES</p>	<ul style="list-style-type: none"> • Don't limit fast food takeaways - not enough options for deliveroo. Uber Eats etc. Limited options in the area. • Concern around night-time economy and the impact that this will have on local areas (e.g. noise and anti-social behaviour). • Too much change and development will gentrify areas and price local people out of areas and ruin community networks. • Support for policy TOW03, however, separation of A5 uses is too lenient, and to avoid over-proliferation this should be increased to a gap of at least 4 non-A5/sui generis units. • Car parking in town centres important and should be maintained. • Our Town Centres must be encouraged to thrive. Boutique style cinemas are a more attractive option than large, multiplex site. • District town centres should not be built to high density and the existing low density maintained to safeguard the amenity of current residents. Housing should be introduced to out-of-town retail sites instead of building to a high density in district town centres. • TOW02 - stronger support should be shown for the principle of upwards extension of properties in town centres to provide residential accommodation. • There should be no loss of active frontages in district town centres. Vacant retail premises should be occupied by pop up shops or by artists wishing to promote their work. • TOW02 (i) markets also facilitate social cohesion and greater interaction.

	<ul style="list-style-type: none"> • The number of betting shops, pay-day loan shops, shisha bars and hot food take-aways should be limited to a low number due to the adverse impact they have on areas and in the case of take-aways the litter and noise disturbance that they create. • TOW04 - no justification is given for the decision to name specific town centres in which night-time economy uses will be particularly supported. • There is an assumption that population growth in town centres (areas with high PTAL) will attract footfall and encourage local business use. It could equally be argued that a high PTAL (especially tube links to Central London) encourages people out of a location • Retail floor space should be energy assessed and poorly built buildings encouraged to be made insulated and energy efficient. • People don't always want to travel to Brent Cross. If local shop units were modernised to include retail units / health care units with better apartment accommodation above this would solve two problems. • Affordable rents should be offered to retailers to encourage them to provide good local shopping to residents who don't wish to travel too far. • Need to be more realistic about future potential for Barnet's town centres as thriving places • Need to acknowledge importance of car parking to success of town centres • Quality of retail offer and public realm is important • Barnet does not have a significant night time economy and should not seek to increase it due to the anti-social problems it would generate • Range of shops, options for fast food, places to hang out and leisure and creative activities need to consider requirements of young people
<p>COMMUNITY USES, HEALTH & WELLBEING</p>	<ul style="list-style-type: none"> • Public transport access to community facilities needs to be improved. • Need to clarify how community facilities will be funded and sustained. • CHW01 should contain a requirement that proposals resulting in a loss of community facilities should demonstrate that replacement facilities can be delivered on identified and available alternative sites to agreed short-term timescales in order to prevent the extended temporary loss of such facilities. • Safer cycle and bus routes required • Strategic walking network would help create more active environment • Need to improve access and promote green and blue spaces Barnet has • Offer space to health care providers as well as retail in high street • Health and wellbeing negatively affected for those looking at block of flats and blocking sunshine • Tall buildings do not make Barnet safe and have an impact on health and wellbeing. • More lighting and CCTV coverage required in busier areas and crime hotspots • Pubs of a certain era should be listed. • CHW01 should include pubs in initial list of facilities

	<ul style="list-style-type: none"> • Provision of CCTV in new developments can be important for community safety. New development must avoid negatively affecting the performance of existing CCTV. • Safety concerns in parks and town centres highlighted by young people • Poor quality of street lighting • Road safety concerns about cycle lanes – considered too narrow • Access to public toilets needs to be improved in town centres • Children’s survey from 2019 highlights knife crime and how young people fear walking in dark due to no lights or badly designed buildings and alleyways • Plan should not just consider faith groups in terms of their contribution to community cohesion. Faith groups have a wider role to play • More emphasis required on tackling crime and anti-social behaviour • Housing and growth is going to put pressure on community infrastructure.
ECONOMY	<ul style="list-style-type: none"> • Need to clarify jobs delivery and what type of employment is expected • Local economy benefits from access to local jobs. • Need to secure S106 contributions for skills and training from development. • Concerned about the lack of employment / education opportunities for people living in the Borough • ECY01 should encourage more pop up spaces • Concern about empty office space within the borough and it is felt that the plan makes too much provision for office space. • How will economy improve with increased population and no new shops. • Studies on office demand not necessarily accurate with many empty offices already. • Stop office conversions – moving council will mean local jobs in whetstone go. Service sector not what UK economy is demanding. • Need accommodation for teachers, nurses and care workers as well as space for industrial hubs
ENVIRONMENT & CLIMATE CHANGE	<ul style="list-style-type: none"> • Provision for biodiversity including bats and targets for tree planting • Support for protecting the Green Belt • Protect the openness of the Green Belt and the principle of just using footprints • Provision in terms of charging points for electric cars • Flood risk is increasing across the Borough • What is the Council doing about the climate emergency ? • How is the Plan going to deliver zero carbon? • Low value sites considered by the BPOSS need strong community involvement. Need to be clear on what constitutes ‘appropriate’ development • Poor waste and recycling provision in Barnet. Policies do not adequately deal with this.

	<ul style="list-style-type: none"> • ECC01 does not go far enough in mitigating towards climate change. • Borough’s environmental assets should be preserved at all costs. • Development should not result in the loss of trees. • Plan should aim for carbon neutral by 2030, not 2050. • In order to meet environmental targets and policy requirements, more needs to be done to get people out of their cars and using more sustainable transport modes. • Policies need to improve access and promote the green and blue spaces. • Air quality scheme could go lot further to protect vulnerable residents from effects of pollution. Monitoring not sufficient and Barnet is not signed up to London Air Quality network • Ensure every new street has trees and involve residents with gardening clubs to look after trees. Plan is set to cut trees along train tracks to build houses • Ensure waterways and streams are dredged regularly • Encourage developers to provide space for food growing • Solar panels on public buildings and bus stops • Update post-war housing stock as priority. Want more on innovation in design and build of new buildings • Housing closest to stations won’t result in less cars - better and safer public transport will • Absence of enforcement measures or penalties for non-compliance for environment policies • Contributions to offset funds should be accepted only as last result • ECC02 - (g) London Plan will encourage all new buildings to have 2 water pipes. This would benefit drainage systems. • ECC03 – why not collect general waste bi-weekly and why not reinstate collection of food waste that is turned into compost for residents. Improve recycling facilities and encourage residents to clean recycling. • ECC04 – support green infrastructure plan but improved access to new regional park needs greater emphasis. • ECC05 – Green Belt shouldn’t be built on or interfered with. • ECC06 – some sites identified include ‘railway verges’, some important for biodiversity and some should be designated for nature conservation. Policy doesn’t mention hedgehogs. Policy and supporting text not specific enough to effectively conserve and enhance biodiversity and achieve measurable net gains. Method by which net gain is assessed needs to be stipulated. The Defra biodiversity metric must be stipulated as the mechanism by which obligation of net gain will be measured
TRANSPORT	<ul style="list-style-type: none"> • Need for a more realistic approach to car parking including use of Controlled Parking Zones rather than restricting new provision in development and removing existing spaces • Concerns about impact of loss of parking spaces from redevelopment of station car parks • Concerns about servicing of residential infill development • More linkages required with the Long-Term Transport Strategy • Basement car parking should be supported • Acknowledge that there is behaviour change amongst younger residents in terms of car ownership and usage

- Apps make public transport easier to use.
- Local residents also use station car parks
- Application of car parking standards needs to reflect blue badge holders and consider impact of topography
- New developments need multiple car parking spaces per home.
- Walking could be more emphasised in transport policies.
- A strategic walking network should be included highlighting connections between facilities. A Rights of Way Improvement Plan would provide more detail of the objectives of the network.
- Road and pavement surfaces and widths need to be improved.
- Owning a car is not the same as using it regularly. It is the type of car (eg. electric) and its frequency of use that is important, not mere ownership.
- Cycling and pedestrian provision and infrastructure is poor.
- All developments should come with a proportion of additional visitor parking bays.
- Transport links need to be improved. More bus lanes needed throughout the Borough.
- More park and rides needed to encourage public transport.
- Need improvements to tube and bus service. Need more bus lanes.
- Should be a mini holland bid around university for cycling
- A tram could provide faster and reliable way to go orbital direction
- Where is commitment to repair pavements and potholes?
- Some areas have free set time parking – can this be extended to every shopping parade and high street.
- Council should provide more inducements for responsible car use, not just disincentives to any car ownership. Council need to provide more on street and car park charging points to encourage electric car uptake.
- The Long-Term Transport Strategy should include improving traffic flows through better use of control mechanisms and alterations to roads
- Aim for carbon neutral transport by 2030, not 2050
- Support introduction of car sharing and dial-a-ride initiatives.
- Vital to run reliable bus services and needs more disincentives for people to use cars. a vi) requires a traffic study to establish feasibility/options.
- Parking standards exceed draft London plan and those directed by Secretary of State – needs updating.
- Parking permits for existing residents should be paid for by developer. Policy unrealistic as won't be able to support increase in population.
- Good idea to build on station car park and suggest to increase charges until people stop using them. Colindale developments have not provided visitor parking
- TRC04 – too vague on broadband facilitations – need specifics. Wifi in Borough needs improving

<p>DELIVERING THE LOCAL PLAN</p>	<ul style="list-style-type: none"> • Delivery of plan unrealistic. • Developers should be held accountable in meeting their obligations and if they make incorrect financial forecasts, then they should have to foot any access themselves, without being able to change on other terms e.g. affordable housing percentage agreed. • More information on how developments / infrastructure is going to be funded. • Council should have final word, not the Mayor of London • Title misleading – could be ‘delivery under the local plan’ or ‘delivering the required infrastructure’ • Increase in population likely put strain on existing infrastructure. Existing capacity of infrastructure provision need to be carefully considered • Under Agent of Change principles developers should be required to provide assessment of the adequacy of existing provisions to support new demands and contribute to expansion where necessary CIL and S106.
<p>LOCAL PLAN SITE PROPOSALS</p>	
<p>General</p>	<ul style="list-style-type: none"> • Concerns expressed across site proposals were focused on indicative housing numbers, building heights, bulk, massing, preferred land uses, flood risk, biodiversity and protection of Metropolitan Open Land / Green Belt.
<p>Site 2 – North London Business Park</p>	<ul style="list-style-type: none"> • Development of this site should include green spaces and pocket parks with walking and cycling routes to provide access for residents and attractive linkages between Brunswick Park Road, Ashbourne Ave, Howard Close and Oakleigh Road. • More details on proposals for NLBP, in particular the impact on the geese
<p>Site 3 – Osidge Lane Community Halls</p>	<ul style="list-style-type: none"> • Use the opportunity to improve walking and cycling access to the primary school and to Brunswick Park open space.
<p>Site 4 – Osidge Library & Health Centre</p>	<ul style="list-style-type: none"> • Use the opportunity to improve walking and cycling access to the primary school and to Brunswick Park open space.
<p>Site 5 – Edgware Hospital</p>	<ul style="list-style-type: none"> • Concerns about proposal wording at Edgware Hospital • Council is allowing NHS locations to be redeveloped for other uses • Site lies on the Strategic Walking network and a footpath runs along the back of the hospital grounds alongside the railway line. Proposals should take the opportunity to ensure effective connectivity to this network and improve the environment of this footpath and open up its access to the Silk Stream.

Site 6 – Watling Avenue carpark & market	<ul style="list-style-type: none"> Proposals should take the opportunity to ensure effective connectivity to this network and improve the environment of this footpath and open up its access to the Silk Stream. Good idea if this contributes to step free access to station plus any improvements to station area
Site 8 – Broadway Retail Park	<ul style="list-style-type: none"> Impact of building heights, especially tall buildings, on the character of the surrounding area and on neighbour amenity. Especially concerned about the height of proposals in Cricklewood, including the B&Q site. Cricklewood' is used as a 'dumping ground' for development.
Site 9 – Colindeep Lane	<ul style="list-style-type: none"> Concerns about impact on biodiversity Site lies on the Strategic Walking network. Development proposals should take the opportunity to ensure effective connectivity to this network and open up its access to the Silk Stream with a walking and cycling route.
Sites 11 - KFC/Burger King Restaurant and 12 -McDonald's restaurant	<ul style="list-style-type: none"> Should provide for more restaurant space to replace existing
Site 13 – Public Health England	<ul style="list-style-type: none"> Site lies on the Strategic Walking network. Development proposals should take the opportunity to ensure effective connectivity to this network and open up its access to the Silk Stream with a walking and cycling route.
Site 14 – Sainsburys The Hyde	<ul style="list-style-type: none"> Open up access to the Silk Stream with a walking and cycling route. Should also include similar sized supermarket with underground car park and fuel pump.
Site 15 - Tesco Coppetts Centre	<ul style="list-style-type: none"> Displacement of car parking space from schemes at Great North Leisure Park Development proposals should take the opportunity to ensure effective connectivity to this network. Roads need major improvement
Site 16 – 45-69 East Barnet Rd	<ul style="list-style-type: none"> Parking provision must be to a minimum 1.5 spaces per dwelling
Site 17 – Danegrove Playing Field	<ul style="list-style-type: none"> Designating Danegrove Playing Field as a development site is blighting the surrounding area Development should provide walking and cycling route through allotment to Belmont open space. Drainage issues already at the fields which may affect nearby houses if build on field.
Site 18 – Former East Barnet Library	<ul style="list-style-type: none"> Site suitable for medical centre or used as council offices or local police station. Old library can be used as day/advice centre for elderly and disabled. Additional parking for school staff and parents
Site 19 – East Barnet Shooting Club	<ul style="list-style-type: none"> Too many homes being considered – should be designated as extra amenity space for residents of Victoria Quarter

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Site 20 – Fayer’s Building Yard and Church	<ul style="list-style-type: none"> • Should be retained as only local building yard in area
Site 21 – New Barnet gasholder	<ul style="list-style-type: none"> • Should not be designated residential but should be a superstore to cope with increase population at Victoria quarter. • Development should incorporate key footpath linkages Development should be no higher than 4 storeys.
Site 22 – Sainsburys New Barnet town centre	<ul style="list-style-type: none"> • Parking for residents must be incorporated into build
Sites 23 – Bobath Centre	<ul style="list-style-type: none"> • Development would further aggravate traffic levels and increase strain on local facilities. • There are limited options to ‘resolve the issue of restricted access’. Traffic pressure from developments as well as development in Prospect Ring – pollution and noise level increased
Site 24 – East Finchley station carpark	<ul style="list-style-type: none"> • Development proposals should take the opportunity to ensure effective connectivity to this network
Site 26 – Park House	<ul style="list-style-type: none"> • Strain on local amenities and parking areas, traffic on High Road and impact on adjacent Cherry Tree Wood • Development would further aggravate traffic levels and increase strain on local facilities.
Site 27-Edgware Town Centre	<ul style="list-style-type: none"> • State of the environment, particularly to the rear of the shopping centre and on the pathways leading past Edgware Primary School. • The state of the Railway Hotel (a local landmark and Grade II listed building). Want to see it repaired and brought back into use. • Too much traffic and congestion on the main roads through the area. • Pollution levels affecting residents, particularly for new residential blocks on major roads. • Development proposals should take the opportunity to ensure effective connectivity to this network.
Site 28 – Edgware underground and bus stations	<ul style="list-style-type: none"> • Proposals should take the opportunity to ensure effective connectivity to this network and open up its access to the Silk Stream with a walking and cycling route.
Site 30 - Finchley Central Station	<ul style="list-style-type: none"> • Loss of car parking spaces will impact on residential streets • The number of dwellings proposed on the Finchley Central station car park site will be catastrophic to the area. It is already highly congested.

	<ul style="list-style-type: none"> • Proposal does not support Plan's approach to the importance of Health and Well-being being supported by the surrounding environment. • By all means make the best use of land, but developing Finchley Central car park most certainly is NOT making the best space of land. • Schedule driven by TfL and their mission to obliterate car use at stations • Sites 30, 59 and 62 – all 3 should be considered together. It is an overdevelopment and intensification of housing in close proximity • Shouldn't be building homes above station. Lack of parking will overflow onto nearby streets.
Site 33 - Bunns Lane Car Park	<ul style="list-style-type: none"> • Loss of car parking spaces will impact on residential streets • People need to park to get into London otherwise they will drive all the way in • Need for step free access at Mill Hill Broadway station • More design parameters in particular on height required
Site 32 – Manor Park Rd car park	<ul style="list-style-type: none"> • Why have 7 units been proposed ? What will be done to replace car parking spaces ?
Sites 34 to 42 – Middlesex University and The Burroughs	<ul style="list-style-type: none"> • Students added to local GP lists in Hendon increasing waiting times for local residents • Studentification in Hendon - residents do not want more student housing in the area • Middlesex University and its students have destroyed the community • Council favours the University over the local community • Altercations between residents and students over parking in residential streets. Want more robust car parking controls i.e. CPZ to be put in place. • Crime and anti-social behaviour – there's a thriving student focused drugs market operating in the streets around the University – alleyways off Edgerton Gardens were specifically mentioned. • Residents feel less safe as a consequence and don't consider the police response to be adequate.
Site 41 – PDSA and Fuller St car park	<ul style="list-style-type: none"> • Car park on Fuller Street is vital for residents. Don't want more students or student accommodation
Site 44 - High Barnet Station	<ul style="list-style-type: none"> • Loss of car parking spaces will impact on residential streets • Site 44 and 45 – unsuitable for development. Whalebones is within conservation area and both sites provide vital carbon-capture for sequestering carbon from polluted areas of High Barnet. • Should not be building homes above station. Lack of parking will overflow onto nearby streets.
Site 45 – Whalebones Park	<ul style="list-style-type: none"> • Unsuitable for development. Whalebones is within conservation area and both sites provide vital carbon-capture for sequestering carbon from polluted areas of High Barnet.

Site 46 – IBSA House	<ul style="list-style-type: none"> • Adequate parking must be supplied due to low PTAL. Footpath connectivity across this site should be explored and provided.
Site 47 - Mill Hill East Station	<ul style="list-style-type: none"> • Capacity of Mill Hill East Station not matching growth • Needs to allow for expanded capacity to handle vast increase in local population. Proposals should take the opportunity to ensure effective connectivity to this network
Site 48 – Mill Hill Library	<ul style="list-style-type: none"> • Development would be disaster to natural beauty of Mill Hill East’s residents and wildlife.
Site 49 – Watchtower House and Kingdom Hall	<ul style="list-style-type: none"> • Site includes Green Belt and public footpaths and shouldn’t be developed/lost • Concerns about proposal wording at Watchtower House
Site 50 – Watford Way & Bunns Lane	<ul style="list-style-type: none"> • It is the western boundary, not eastern that abuts the A1. Fly tipping currently happens. This site lies on the Strategic Walking network. Proposals should take the opportunity to ensure effective connectivity to this network. Residents already have high amount of traffic pollution; building will not only increase pollution levels but an exit road will have to be built
Site 52 – Kingmaker House	<ul style="list-style-type: none"> • There is too much development in too small an area when taking Victoria Quarter into consideration
Site 53 – Allum Way	<ul style="list-style-type: none"> • Development proposals should take the opportunity to ensure effective connectivity to this network. High density development will cause overcrowding, pressure on Totteridge and Whetstone station, destruction of green areas and excessive traffic on Totteridge Lane
Site 54 – Barnet House	<ul style="list-style-type: none"> • High density development will cause overcrowding, pressure on Totteridge and Whetstone station, destruction of green areas and excessive traffic on Totteridge Lane.
Site 55 – Woodside Park Station east	<ul style="list-style-type: none"> • Site boundary is wrong. 20% retention doesn’t meet GSS09 last paragraph. Access to be improved and sufficient car parking retained
Site 56 – Woodside Park Station west	<ul style="list-style-type: none"> • Site contains a locally listed signal box (HT00894). Concerns that 356 units would require tall buildings and harm amenity of neighbouring occupiers. This site lies near to the Strategic Walking network.
Site 58 - 811 High Rd & Lodge Lane car park	<ul style="list-style-type: none"> • Proposal should include residential in existing uses. Public car park must be re-provided. Road is historically important and has small cottages and proposal would dwarf these and destroy character of lane

Site 59 – Central House	<ul style="list-style-type: none"> Sites 30, 59 and 62 – all 3 should be considered together. It is an overdevelopment and intensification of housing in close proximity
Site 60 – Finchley House (key site 3)	<ul style="list-style-type: none"> Recently redeveloped to add more stories to lower part of the block. Appears to now all be residential
Site 61 – Tally Ho Triangle (key site 1)	<ul style="list-style-type: none"> Concerned about relocation of the street market.
Site 62 – Tesco's Finchley	<ul style="list-style-type: none"> Sites 30, 59 and 62 – all 3 should be considered together. It represents overdevelopment and housing intensification
Site 64 – 744-776 High Rd	<ul style="list-style-type: none"> Site contains at least 2 locally listed buildings - Bohemia and Santander
Site 66 – East Wing (key site 4)	<ul style="list-style-type: none"> Needs to reflect existing uses including leisure facilities, light industrial uses adjoining to rear. This is a significant Art Deco structure that recently been refurbished with addition of flats and must be retained
Site 67 – Great North Leisure Park	<ul style="list-style-type: none"> Site lies on the Strategic Walking network. Proposals should take the opportunity to ensure effective connectivity to this network and to improve the existing footpath.

Response on General Comments at Regulation 18

- A prime purpose of the Local Plan is to ensure that growth is supported by infrastructure with funding generated from development in terms of Community Infrastructure Levy and S106. We need to demonstrate this through the Infrastructure Delivery Plan. The infrastructure funding helps to mitigate new growth, it cannot replace funding that has been withdrawn through spending cuts.*
- The Local Plan has to address many audiences and serve as the framework for planning decisions for at least 5 years. We have added an acronym buster and glossary to help explain the jargon and provided a Q and A webpage to help answer frequently asked questions*
- Housing target has been reduced in line with the London Plan*
- There has been an extensive period of engagement on the Reg 18 generating in excess of 2,000 representations from 450 individual representors. Engagement activities included 30 face to face events reaching an estimated audience of 800 persons.*

- *Consultation has been carried out in accordance with the Statement of Community Involvement – a formal document which sets out how the Council consults on planning documents, planning applications and other planning matters in Barnet.*
- *The Plan supports active and sustainable travel, promoting modes other than the private car, particularly cycling and walking.*
- *Plan is restrictive on car parking but realistic on car park redevelopment. Car parks particularly in town centres serve an important function but management and more efficient use of space used for parking can be improved.*
- *A key purpose of the Local Plan is about managing change and ensuring that all the qualities that attract people to live in Barnet are retained.*
- *National planning policy supports densification around locations with good public transport access*
- *Air quality is an important priority for the Local Plan*
- *Good growth is socially and economically inclusive as well as environmentally sustainable. It is about utilising Barnet's advantages to deliver sustainable growth that works for everyone, contributing to strong and cohesive, family friendly communities, promoting healthy living and wellbeing, as well as delivering the homes that the Borough needs.*
- *This involves making the Borough a place of economic growth and prosperity, equipping residents, in particular young people to benefit from new opportunities by having the right skills*
- *Through the Local Plan we are creating an environmentally sustainable Barnet that has built resilience to climate change.*

Response on Barnet's Vision and Objectives

- *Vision and Objectives have been revised to better reflect the Borough's natural and historic environments as well as emphasising that Barnet is a family friendly place.*
- *Ensuring town centres recover from the impact of COVID19 is emphasised.*
- *Approach on offices and retail space has changed following the changes to the Use Classes Order in 2020.*
- *Key Diagram has been revised.*
- *Crossrail 2 delivery now not expected within lifetime of the Local Plan.*
- *Housing target reflects London Plan.*
- *Ensuring that the Borough retains the qualities that make it attractive while also accommodating the needs of future generations for new homes, jobs and infrastructure is a role for the new Barnet Local Plan.*

Response on Growth and Spatial Strategy

- *The Government sets the agenda for growth, with its long stated ambition of delivering 300,000 new homes per annum. Barnet has to play a part in contributing to meeting this target. The Local Plan is the means for ensuring that we get the right growth.*
- *Re-establishing connections between local centres and their surrounding communities is important to enabling residents to meet their daily needs via walking or cycling*
- *Properly planned and well-designed tall buildings delivered in the right locations can make an important contribution to place shaping and revitalising Barnet's town centres as well as attracting investment to the Growth Areas.*
- *It's important that town centres can protect and enhance their distinctive offer to surrounding communities, this includes Burnt Oak.*
- *The positive benefits of growth and investment generated by the Local Plan will be accessible to all Barnet residents, removing physical barriers to enable all to share in new social and community infrastructure and access a range of housing types and a thriving jobs market while enjoying living in a safe, healthy and sustainable Borough.*
- *Approach to Brent Cross has changed. Local Plan recognises that revitalisation of the Shopping Centre will not lead comprehensive regeneration of the Brent Cross Growth Area.*
- *Local Plan emphasises opportunity for Colindale to become a more sustainable place where alternative modes to the car are an attractive and safe means of getting around. Good street lighting and attractive public realm are very important to encouraging people to walk rather than drive.*
- *In considering planning applications all material policies in the Local Plan need to be taken into account. Cross-references are made in the Local Plan where necessary.*
- *Policy on Major Thoroughfares highlights the importance of relating to the context and character of the surrounding areas.*

Response on Housing

- *The impact of the Government's changes to the Use Classes Order in 2020 and subsequent expansion of permitted development rights in 2021 are referred to in the Local Plan.*
- *Helping people to live independently is an objective of the Council*
- *Managing change through having an up-to-date Local Plan and having a robust 5 year housing supply helps to defend the Borough's character and resist overdevelopment.*

- *Well-designed flats approved through the planning system are not the slums of tomorrow. However housing quality is an issue with residential conversions of commercial property through permitted development and the mismanagement of the existing private housing stock.*
- *Affordable housing policy is set within the parameters of the London Plan and national planning policy. It is supported by a Local Plan Viability Assessment. New provision has been added for keyworkers.*
- *It is not appropriate for a Local Plan document to go into detail about funding or legal contracts around affordable housing*
- *Although private housebuilders dominate the housing market with provision of homes for sale there is a need to widen choice of tenure. This is reflected in the Local Plan's emphasis on build to rent.*
- *Policy on self-build is realistic, reflecting the overall level of housing need in the Borough. There is a good market response to self-build as demonstrated by the number of CIL exemptions in Barnet.*
- *Plan does not support development in Green Belt or MOL.*
- *Walking distance is a more appropriate measure for HOU03. The distance that can be walked in 10 minutes is variable.*
- *Policy on gypsies and travellers reflects an update to evidence.*
- *Downsizing opportunities are generated by delivering new well-designed homes in places where people choose to live.*
- *Local Plan has a bespoke policy on the conversion and redevelopment of existing homes. We seek to protect the stock of family homes as part of being a family friendly Barnet.*
- *Tall buildings are only appropriate in the strategic locations outlined in the Local Plan.*
- *Funding generated by new development in terms of CIL and S106 helps to mitigate growth. The planning system is not the sole funder of new infrastructure provision. Other public sector bodies such as the NHS and Department for Education also have a remit to respond to growth including demographic growth.*

Response on Character, Design and Heritage

- *Policies in this Chapter clearly set out our expectations on housing standards, helping to deliver good quality well designed homes and buildings*
- *There is a monitoring framework behind the Plan. This helps ensure that policies are being implemented in the right way*
- *Delivering new policies and proposals in the right way requires continuous support and training for planning decision makers including elected members and development management officers.*

- *Policies are further supported by a suite of Supplementary Planning Documents, putting more detail on Local Plan policies, particularly on Design Codes and infill development*
- *Tall buildings policy has been revised and strengthened, setting out more considerations including how the building relates to its surroundings, both in terms of how the top affects the skyline and how its base fits in with the streetscape, and integrates within the existing urban fabric, contributing to pedestrian permeability and providing an active street frontage where appropriate*
- *Revised policy also highlights considerations in terms of how tall building proposals respond to topography, with no adverse impact on longer range Locally Important Views, as well as mid-range and intermediate views*
- *Proposals for tall buildings should take account of, and avoid harm to, the significance of Barnet's and neighbouring boroughs heritage assets and their settings.*
- *Relationship between tall building and the surrounding public realm is another consideration, ensuring that the potential microclimatic impact does not adversely affect levels of comfort, including wind, daylight, temperature and pollution*
- *Important to highlight that context and local character are key considerations in the design of residential extensions. Extensions should not impact on the character of the surrounding area or cause harm to established gardens, open areas or nearby trees.*
- *Well designed public realm has an important part to play in attracting people to rejuvenated town centres and new regeneration areas such as Brent Cross and Colindale.*
- *The Plan seeks to manage advertisements effectively in terms of number, size, siting and illumination, as key considerations to ensure that they do not have substantial detrimental impact on the public safety, character and amenity of the surrounding area and residents.*

Response on Town Centres

- *Creating the conditions for thriving town centres is very much the focus of the Local Plan.*
- *Town centres can be active and attractive destinations for commercial, business and service uses.*
- *Opportunities to improve the town centre offer are promoted throughout the Local Plan.*
- *Retail will still remain an import trading function in town centres.*
- *Local Plan contains a bespoke policy on affordable workspaces.*
- *Local Plan promotes the concept of 15 minute neighbourhoods where everyday needs can be met by means of cycling or walking within 15 minutes of residents homes.*

- *Meanwhile uses can take advantage of vacant retail units.*
- *Parking spaces can be more efficiently designed and better managed to provide a more sustainable contribution to town centres.*
- *Travel modes such as walking and cycling can be supported by improvements to public realm, as can access to public transport.*
- *Controlling the clustering of certain uses within the parameters of the planning system can help ensure town centres are attractive places where people feel safe and want to spend time.*
- *Plan does not support measures to enhance out of town retail in existing retail parks.*
- *Town centres and Growth Areas with the best prospects for the Night-Time Economy have been identified through the London Plan and Barnet's Growth Strategy.*

Responses on Community Uses and promotion of health and wellbeing

- *The Infrastructure Delivery Plan sets out the infrastructure to support growth and the funding contributions from development required to deliver it. The Infrastructure Delivery Plan is a living document.*
- *Principles of designing out crime form a key element of design policies.*
- *Making Barnet a Safer Place sets out the range of actions the Council is undertaking to contributing to safer environments.*
- *There is a need to allow for adequate daylight, sunlight, privacy and outlook for adjoining and potential occupiers and users. This is reflected in Local Plan design policies*
- *Community uses are supported in the town centres (including local centres), as these locations are associated with higher levels of public transport accessibility.*
- *Enhancement or relocation of community uses is supported by the Council on the basis that this does not reduce service coverage in other parts of the Borough. This approach will deliver community uses and support the wider vitality and viability of the town centre particularly through the maintenance of an active street frontage.*
- *Pubs can become Assets of Community Value outside the planning process.*
- *Plan addresses effective wireless communication for CCTV monitoring and management and helping people feel safe. Contributions from developments taller than 3 storeys may be required to deliver infrastructure for CCTV to ensure continuity of coverage of an area.*

Response on Economy

- *Chapter revised to reflect changes to the Use Classes Order and the creation of a wider use class for commercial, business and service uses.*
- *Provision for keyworker accommodation reflected in Affordable Housing policy.*
- *Safeguarding of employment space in town centres and designated industrial areas to provide opportunity for businesses to grow remains a priority*
- *New policy on provision of affordable workspace to help support business*
- *Renewed emphasis on local jobs, skills and training, helping recover from rising unemployment particularly amongst young people*
- *Pop up uses as part of meanwhile uses is supported by the Local Plan*

Response on Environment and Climate Change

- *Strong emphasis on protection of biodiversity throughout the Local Plan*
- *To make Barnet carbon neutral by 2050 the Council is progressing a Sustainability Strategy that sets out the actions we will take to deliver a green and thriving Borough.*
- *A new Regional Park within the Brent Valley and Barnet Plateau Green Grid Area remains an ambition of the Council.*
- *A key focus of the Local Plan and Sustainability Strategy is on keeping neighbourhoods clean, green and with good air quality, ensuring that development and growth in the borough is sustainable, maximising reusing and recycling, and reducing consumption and waste.*
- *Reference is made to the Biodiversity Metric 2.0 as the current method for calculating Biodiversity Net Gain*
- *There is substantial protection for the Green Belt in the Local Plan.*
- *Barnet values the services trees offer the Borough not only for the amenity and habitat value they offer but also for their ability to assist the Borough in managing the heat island effect and improving air quality, this is set out in the Barnet Tree Policy document.*
- *Any loss of trees or greenspace for private development will therefore need to be adequately compensated*
- *Reference is made in the Local Plan to maintaining links between gardens such as hedgehog highways.*

Response on Transport and Communications

- *Barnet has revisited the Parking Study to justify bespoke residential parking standards. In terms of other parking standards we follow those set out in the London Plan.*
- *Plan has been updated to reflect the Long-Term Transport Strategy.*
- *Promoting orbital travel improvements where appropriate is a key priority for the Local Plan.*
- *Walking and cycling are transport modes that the Council is keen to promote due to the many benefits they provide ranging from reducing the use of private cars with consequent improvements for air quality*
- *Aim to encourage a more active and healthy population as increased walking and cycling provides health benefits for the individuals derived from partaking in exercise.*
- *Plan is supported by a Strategic Transport Assessment.*
- *Parking management requires a joined-up approach including the introduction of Controlled Parking Zones. Management has an important part to play in ensure more efficient and sustainable parking provision.*
- *Policy supports the Healthy Streets Approach, helping provide more attractive alternatives to reliance on cars.*
- *Less cars on the road will help improve traffic flows.*

Response on Delivering the Local Plan

- *Chapter 12 has been revised to more clearly reflect how the growth set out in the Local Plan will be delivered.*
- *Evidence base updated with publication of the Infrastructure Delivery Plan and the Local Plan Viability Assessment*
- *New CIL Charging Schedule is progressing ahead of the Local Plan.*
- *Local Plan has to be in general conformity with the London Plan.*
- *The Infrastructure Delivery Plan sets out the infrastructure to support growth and the funding contributions from development required to deliver it. The Infrastructure Delivery Plan is a living document.*
- *The Council ensures that developers make their planning obligations and CIL contributions when consents are implemented*


Appendix H - Consultation Events Feedback – Regulation 19 Consultation

Events/Meeting Name & Date	Feedback
<p>FORAB 30 June 2021 Online</p>	<p>Following a presentation by the Council including a short video about the Local Plan FORAB highlighted a number of concerns about the Reg 19 Local Plan and in order to inform their responses to the consultation requested clarification on a number of issues</p> <ul style="list-style-type: none"> • Housing numbers in the Local Plan – whilst the reduction in the housing target to that of the London Plan is welcomed there is confusion about the ambition to deliver 46,000 new homes within 15 years when the target is 35,000. There is also confusion about demographic change and how housing numbers relate to this. The Plan should clarify and better explain the change in numbers. In particular there is concern about the evidence behind the figures in Table 5 which still adds up to 46,000 new homes. The population growth/ new housing relationship is fundamental to the Plan. Two figures serve to confuse, and the higher figure is unnecessary • Town Centres – FORAB note the revisions made to Table 5 and have particular concerns about delivery from the 5 District Town Centres. These figures seem high from very narrowly defined areas. The definition of the area encompassing the town centre target should be made clear and figures should be checked to ensure there is no duplication with targets under other headings. • There is a presumption that existing transport hubs have potential for growth without any evidence to assess whether the public transport provision in particular the Northern Line will have the capacity to meet additional demand. • Redevelopment of car parks needs to be considered very carefully. Many residents cannot visit town centres without cars in order to purchase bulky goods such as tins of paint. • Highlighted that that to be sustainable housing growth should be matched with jobs growth. Concerns expressed about safeguarding of business locations against housing regeneration and what mixed use development actually delivered for displaced businesses. New Barnet was identified as a particular example of this happening. • Concerns expressed about the justification for a minimum gross internal floor area of 74 m2 when the London Plan suggests 86m2. FORAB want this number raised to 86m2 and question how this space will deliver family homes for 4 people. Surely the Council should be emphasising on family home space standards rather than flats with two small bedrooms where a family of four with two children of different gender cannot stay. Concerns expressed about future provision of family homes. Policies need to be more robust in restricting the attraction of 2 bedroom flats.

	<ul style="list-style-type: none"> • More reassurance is needed on design quality and the Council's approach to design codes. This includes a commitment to establish a Design Review Panel of appropriately qualified individuals to review all schemes over a certain size or in sensitive locations. • Policy on tall buildings fails to address the issue of medium rise buildings outside the strategic locations. This is of great concern. Need more reassurance on how surrounding context in terms of prevailing height is factored in. • Need to be more realistic about protecting town centres including use of safeguards such as Article 4 Directions. • Reliance on Parks and Open Spaces Strategy is neither sensible nor sustainable. • Progress of the West Finchley Neighbourhood Plan to confirmatory referendum on July 8th 2021 was welcomed.
<p>Barnet Youth Board 29 July 2021</p>	<p>This was held online. Participants were taken through a short presentation and video by the Council about the Local Plan. Members of the Youth Board provided feedback on the issues that most concerned them.</p> <p>In order to initiate feedback Slido polls were undertaken to identify the parts of the Borough they were most interested in as well as prioritising the Chapters of the Local Plan.</p> <p>Which part of Barnet are you most interested in</p> <p>Chipping Barnet – 33%, Hendon – 33%, Finchley and Golders Green -33%</p> <p>What part of Barnet's Local Plan are you most interested in? (listed in order of preference shown by final vote)</p> <ol style="list-style-type: none"> 1. Environment and Climate Change – 8.83 2. Economy – 7.17 3. Community Uses, Health & Wellbeing - 6.83 4. Transport & Communications – 6.33 5. Growth & Spatial Strategy – 6.00 6. Delivering the Plan – 5.33 7. Town Centres – 4.50 8. Housing – 4.33 9. Character, Design and Heritage – 3.17 10. Site Proposals – 2.50 <p>Members of the Youth Board wanted to know more about what the Plan was doing to deliver zero carbon by 2030 and how Barnet was going to change with more housing development. It was highlighted that</p>

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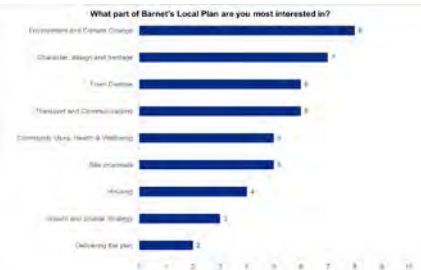
	<p>construction activity makes a major contribution to carbon emissions. Ensuring that buildings are reused rather than redeveloped should be prioritised.</p> <p>Members liked living in the Borough but were concerned about future economic prospects for them and their families as well as local jobs available for Barnet’s growing communities.</p> <p>Feeling safe in the Borough, particularly in town centres, open spaces and on public transport was highlighted as an issue. People would visit these places more if there was more visible security. Recognised that design can play an important role in making places feel safer. Members also highlighted that they would not want security to be heavy handed and restrictive.</p> <p>Attractive town centres were important as was having interesting places to eat. Public realm should enable opportunities for a range of street food options.</p> <p>Members highlighted that although they used public transport for trips such as going to and from school they were reliant on parents ferrying them around. This was more about convenience than safety, although that was a consideration. Improvements to public transport services in terms of routes and frequencies would make them more popular. If cycling was safer and more protected from cars, vans, buses and lorries they would probably use it for getting around.</p>
<p>Barnet Multi Faith Forum AGM 21 July 2021 Online</p>	<p>The Multi Faith Forum gave the Council the opportunity to promote the Reg 19 Consultation at their AGM. Details of the public consultation were made available to all participants in the AGM. As was an opportunity to ask for any questions relating to the Local Plan.</p>
<p>Online Community Meeting 8th July 2021 6pm-7.30pm</p>	<p>The public consultation events were promoted through social media, on-line through the council’s website</p> <p>The session was hosted and facilitated by Mark Yeadon, Director of independent research and consultation organisation Public Perspectives.</p> <p>The sessions began with a presentation by a Planner from the Policy Team responsible for producing the Local Plan. This was followed by a facilitated discussion and question and answer session involving a panel of planning representatives, both verbally and using the ‘Chat’ function in Zoom.</p> <p>26 attended the session, including 8 officers.</p> <p>2 Polls were conducted to determine what area of the Borough participants were interested and what sections of the Draft Local Plan they were most interested in:</p>



Roughly, which part of Barnet are you most interested in?

Part of Barnet	Number of Respondents
Chipping Barnet	1
Finchley and Golders Green	5
Harpenden	5
All of the London Borough of Barnet	5

Number of respondents: 16 (not all participants responded to the poll). The results should be treated indicatively as a broad gauge of sentiment rather than conclusively, given the relatively small number of participants and the nature of a 'poll' being a snapshot in time.



What part of Barnet's Local Plan are you most interested in?

Part of Local Plan	Number of Respondents
Economics and Census Change	7
Character, design and heritage	7
Transport	6
Transport and Communications	6
Community, Arts, Health & Wellbeing	5
Site proposals	5
Housing	4
Quality and Global Strategy	3
Delivering the plan	2

Number of respondents: 15 (not all participants responded to the poll). Participants could select more than one response.

During the panel discussion, the following questions/points were most commonly raised:

- Concerns about, and managing, housing growth, and its implications for character, design and heritage.
- Ensuring benefits to local residents around housing growth, including access to family and affordable housing (both buy and rent) and sufficient transport and community infrastructure is in place.
- Questions about how to make formal representations about specific site proposals in the Local Plan, driven by concerns about housing growth and lack of suitability of the proposed site.

The chat function also had discussions occurring in it, these were the main points:

- Level of development occurring in the Borough
- Housing need
- Affordability of housing

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	<ul style="list-style-type: none"> • Housing size and quality • Green Belt, open spaces • Pedestrian and cycle routes along the Silk Stream • Design of buildings • Concerns regarding sites, 										
<p>Online Community Meeting Date: Wednesday 21st July 2021 Time: 6pm-7.30pm Location: On-line, via Zoom</p>	<p>The public consultation events were promoted through social media, on-line through the council’s website. 23 attended the session, including 7 officers and Public Perspectives’ staff.</p> <p>The sessions were hosted and facilitated by Mark Yeadon, Director of independent research and consultation organisation Public Perspectives.</p> <p>The sessions began with a presentation by a Planner from the Policy Team responsible for producing the Local Plan. This was followed by a facilitated discussion and question and answer session involving a panel of council representatives, both verbally and using the ‘Chat’ function in Zoom.</p> <p>2 Polls were conducted to determine what area of the Borough participants were interested and what sections of the Draft Local Plan they were most interested in:</p> <div data-bbox="622 770 1048 1050" data-label="Figure"> <table border="1"> <caption>Roughly, which part of Barnet are you most interested in?</caption> <thead> <tr> <th>Area</th> <th>Number of Responses</th> </tr> </thead> <tbody> <tr> <td>Chipping Barnet</td> <td>3</td> </tr> <tr> <td>Finchley and Golders Green</td> <td>1</td> </tr> <tr> <td>Hendon</td> <td>2</td> </tr> <tr> <td>All of the London Borough of Barnet</td> <td>6</td> </tr> </tbody> </table> </div> <p>Number of respondents: 11 (not all participants responded to the poll). The results should be treated indicatively as a broad gauge of sentiment rather than conclusively, given the relatively small number of participants and the nature of a ‘poll’ being a snapshot in time.</p>	Area	Number of Responses	Chipping Barnet	3	Finchley and Golders Green	1	Hendon	2	All of the London Borough of Barnet	6
Area	Number of Responses										
Chipping Barnet	3										
Finchley and Golders Green	1										
Hendon	2										
All of the London Borough of Barnet	6										



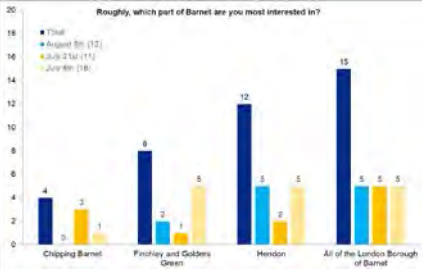
Number of respondents: 10 (not all participants responded to the poll). Participants could select more than one response.

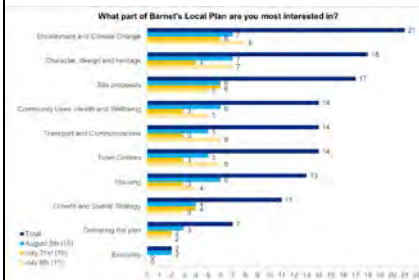
During the panel discussion and through the 'Chat' function, the following questions/points were most commonly raised:

- Concerns that the Local Plan is not doing enough to address Climate Change and promote a green environment.
- Concerns about the implementation of the Plan in practice, especially around the use of S106 monies to promote community benefit and address infrastructure concerns, and also around the role of the Plan in planning applications and enforcement.
- Concerns about, and managing, housing growth, and its implications for character, design and heritage.
- Ensuring benefits to local residents around housing growth, including access to family and affordable housing (both buy and rent) and sufficient transport and community infrastructure is in place.
- Concerns around High-rise developments.
- Questions about how to make formal representations about specific site proposals in the Local Plan, driven by concerns about housing growth and lack of suitability of the proposed site.

The chat function also had discussions occurring in it, these were the main points:

- Development on the Ridgeway, along with impacts such as traffic and public transport and need for local shops.
- Air quality
- Need for family homes (not blocks of flats)
- S106 spend
- Address issue of unoccupied homes
- Potholes

	<ul style="list-style-type: none"> • Need for better enforcement • Environmental requirements • Why is carbon offset acceptable • London Parks and Gardens • Effectiveness of consultation • Tall buildings everywhere • Bus routes/ accessible public transport • Need for local shops 																									
<p>Online Community Meeting Date: Thursday 5th August 2021 Time: 6pm-7.30pm Location: On-line, via Zoom</p>	<p>The public consultation events were promoted through social media, on-line through the council's website.. 33 attended the session on the 5th August, including 10 officers and Public Perspectives' staff.</p> <p>The sessions were hosted and facilitated by Mark Yeadon, Director of independent research and consultation organisation Public Perspectives.</p> <p>The sessions began with a presentation by a Planner from the Policy Team responsible for producing the Local Plan. This was followed by a facilitated discussion and question and answer session involving a panel of council representatives, both verbally and using the 'Chat' function in Zoom.</p> <p>2 Polls were conducted to determine what area of the Borough participants were interested and what sections of the Draft Local Plan they were most interested in:</p>  <table border="1"> <caption>Roughly, which part of Barnet are you most interested in?</caption> <thead> <tr> <th>Area</th> <th>Total</th> <th>August 5th (12)</th> <th>August 2nd (11)</th> <th>June 8th (18)</th> </tr> </thead> <tbody> <tr> <td>Chipping Barnet</td> <td>4</td> <td>0</td> <td>3</td> <td>1</td> </tr> <tr> <td>Finchley and Golders Green</td> <td>8</td> <td>3</td> <td>1</td> <td>5</td> </tr> <tr> <td>Hendon</td> <td>12</td> <td>5</td> <td>2</td> <td>5</td> </tr> <tr> <td>All of the London Borough of Barnet</td> <td>15</td> <td>5</td> <td>5</td> <td>5</td> </tr> </tbody> </table> <p>Numbers in brackets are the number of respondents: (not all participants responded to the poll). The results should be treated indicatively as a broad gauge of sentiment rather than conclusively, given the relatively small number of participants and the nature of a 'poll' being a snapshot in time.</p>	Area	Total	August 5th (12)	August 2nd (11)	June 8th (18)	Chipping Barnet	4	0	3	1	Finchley and Golders Green	8	3	1	5	Hendon	12	5	2	5	All of the London Borough of Barnet	15	5	5	5
Area	Total	August 5th (12)	August 2nd (11)	June 8th (18)																						
Chipping Barnet	4	0	3	1																						
Finchley and Golders Green	8	3	1	5																						
Hendon	12	5	2	5																						
All of the London Borough of Barnet	15	5	5	5																						



Numbers in brackets are the number of respondents: (not all participants responded to the poll). Participants could select more than one response.

During the panel discussion and through the 'Chat' function, the following questions/points were most commonly raised:

- Discussion around the link/relationship between the Local Plan and area Supplementary Planning Documents.
- Concerns that development is undermining the local environment and not doing enough to promote climate friendly approaches, as well as calls for healthy streets.
- Concerns about the amount of housing development, population growth and its impact on community cohesion and local infrastructure.
- Questions about how the Local Plan has been updated to reflect the challenges of the pandemic, including supporting high streets and town centres, and changing estimations around the amount of office space required with a potential growth in homeworking.

The chat function also had discussions occurring in it, these were the main points:

- Hendon Hub
- Value of a Supplementary Planning Document (SPD)
- Carbon status of new homes and lifetime homes
- Compulsory Purchase Orders
- Student Housing – not good for communities as they are for temporary occupation
- Overdevelopment of Colindale and Hendon

	<ul style="list-style-type: none">• Office evidence 2017 – how confident that this is still relevant post pandemic• Homeworking• Carbon offsetting• Development on car parks• Biodiversity Net Gain – ability of the Council to monitor• Step free access and disabled access at rail stations• Healthy Streets Approach• Site Allocations• Need to discourage private car ownership – provide less parking• Flooding• Effectiveness of consultation• Low traffic neighbourhoods• Development at Finchley Central Station
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Appendix I – Response Forms for Regulation 19 consultation



Barnet Draft Local Plan

Publication Stage Representations Form

Ref:

(For official use only)

This form should be used to provide representations on the London Borough of Barnet Draft Local Plan. Representations must be received by 23:59 on 9th August 2021. Only those representations received within this period have the statutory right to be considered by the inspector at the subsequent examination. This form can be submitted via email to forward.planning@barnet.gov.uk or by post to Planning Policy Team, 7th Floor, 2 Bristol Avenue, Colindale, London, NW9 4EW.

Please read the guidance note, available on the Council's Engage webpage, before you make your representations. The Draft Local Plan and a full list of supporting documents and evidence are also available to view and download from the Council's Local Plan Review webpage:

<https://www.barnet.gov.uk/planning-and-building/planning-policies-and-local-plan/local-plan-review>

Please note:

- Representations must only be made on the basis of the legal compliance or soundness of the Plan, or compliance with the Duty to Co-operate.
- All representations are required to be made public and will be published on the Council's website following this consultation. Your representations and name/name of your organisation will be published, but other personal information will remain confidential. Anonymous responses will not be considered. Your personal data will be held and processed in accordance with the Council's Privacy Notice which can be viewed at: <https://www.barnet.gov.uk/your-council/policies-plans-and-performance/privacy-notices>

This form has two parts:

Part A - Personal details - only necessary to complete once

Part B - Your representation(s) - please complete a separate sheet for each representation you wish to make.

PART A – Personal Details

	Personal details	Agent details (if applicable)
Title		
First name		
Surname		
Job Title (where relevant)		
Organisation name (where relevant)		
Email address (where relevant)		
Telephone number		
Address line 1		
Address line 2		
City/Town		
Postcode		

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Country		
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If you are submitting a representation on behalf of a group of individuals, please indicate how many people you are representing and describe how the representation has been authorised:

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You can request to be added to the Council's planning policy consultation database by emailing us at forward.planning@barnet.gov.uk. You will then be notified when planning policy related documents are available for consultation or are adopted.

You can request to be removed from any or all mailing lists at anytime by emailing us at the same email address.

Continue on a separate sheet if necessary

Question 4: Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect to the matters you have identified in Question 3 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Continue on a separate sheet if necessary

Please note:

In your representation you should summarise succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

Question 5: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing sessions?

Yes, I wish to participate in hearing session(s)

No, I do not wish to participate in hearing session(s) /

I am not seeking modification to the Plan

Question 6: If you wish to participate at the examination hearings, please outline why you consider this to be necessary.

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.

Declaration of consent

The personal information you provide on this form will be processed in accordance with General Data Protection Regulations 2018 (GDPR). The information you provide will only be used for the purposes of the preparation of the Local Plan as required by the Planning and Compulsory Purchase Act 2004 (as amended), and may be used by the Council to contact you if necessary, regarding your submission. Your name, name of organisation, and comments, will be made available for public inspection when displaying and reporting the outcome of the statutory consultation stage and cannot be treated as confidential. You will not be asked for any unnecessary information and we will not publish any personal data beyond what is stated in this declaration.

Your details will be kept in accordance with the Council's Privacy Notice, until the Local Plan is adopted plus a further five years to evidence that a fair and transparent process has been followed. Processing is kept to a minimum and data will only be processed in accordance with the law. We will take all reasonable precautions to protect your personal data from accidental or deliberate loss or unauthorised disclosure.

The Council's Privacy Notice can be viewed at <https://www.barnet.gov.uk/your-council/policies-plans-and-performance/privacy-notices>

The legal basis which enables the Council to process your data for this purpose is consent from the data subject (you) under Article 6, paragraph (a) of the GDPR. Information provided will be stored in accordance with the Council's retention and disposal guidelines.

By completing and signing this form I agree to my name, name of organisation, and representations being made available for public inspection on the internet, and that my data will be held and processed as detailed above, in accordance with the Council's Privacy Notice:

Signature _____

Date _____

Appendix J - Regulation 19 Summary of the main issues raised in responses, and views expressed in relation to soundness, legal compliance or the duty to cooperate when preparing the plan.

This represents LBB officer summaries of the key representations made on the policies and proposals within the Reg 19 Local Plan. Reference should be made to full representations for complete text and context in which the summarised representation was made.

Chapter / policy	Main issues raised
BARNET'S VISION & OBJECTIVES	
Policy BSS01 : Spatial Strategy for Barnet	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Council's strategy does not explain the London Plan capacity constrained housing requirement beyond 2029 in years 10 to 15 of the Local Plan. 2. Plan's approach to housing supply does not positively support contribution of small sites. 3. Plan's 15 year timeframe from adoption is not consistent with NPPF para 22. 4. Housing target should reflect Barnet's objectively assessed need which is greater than London Plan housing requirement. 5. Retail floorspace figure is not justified given nationwide evidence of declining demand. 6. Plan's approach fails to prioritise previously developed land. 7. Council should be assessing potential of the Green Belt to deliver higher levels of growth to address unmet need. 8. Policy should clarify that the design-led approach should also be used to maximise the development potential of sites and make the best use of land. 9. Plan's identification of a Sport and Recreation Hub in Green Belt is not justified by very special circumstances. <p>Non Compliance with Duty to Cooperate</p> <ol style="list-style-type: none"> 10. Plan's reduction in housing target increases housing pressures on Hertsmere. <p>Council's strategy is justified</p> <ol style="list-style-type: none"> 11. Plan is projecting forward the capacity-constrained figure of 2,364 net additional homes a year to support a 15-year plan, in line with the requirement of the NPPF. 12. Plan recognises the significant development potential of the Borough through identification of Opportunity Areas and Growth Areas. 13. Plan highlights a supply of 46,000 new homes in meeting objectively assessed need against a housing requirement of 35,460 new homes.
GROWTH & SPATIAL STRATEGY	

<p>Policy GSS01 : Delivering Sustainable Growth</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Plan needs clarification with regard to terminology of Opportunity Area and Growth Area 2. Plan’s allocation for small sites is only theoretical supply – it is a windfall figure. This is contrary to the thrust of national and London Plan policy, which requires local authorities to adopt more active measures to identify and allocate small sites of 0.25ha in size or less, especially where these are within 800m of the town centre boundary. 3. Plan is over reliant on large and complex urban regeneration sites. 4. Plan’s approach to meeting identified [industrial need] through intensification and windfall is an unrealistic strategy. 5. Plan should take a flexible and more positive approach to density with considering comprehensive redevelopment proposals, with optimum density resulting from a design-led approach. 6. Plan should express housing figures for each location as a minimum in the same manner as the overall housing target in order to retain flexibility in the policy, maximise development potential and encourage the most efficient use of land. 7. Plan unclear with supply of 46,000 new homes by 2036 (in Table 5) against minimum target of 35,460 (BSS01) and appears to be aimed at accommodating far more people than projected population growth. 8. Plan needs to clearly define boundaries of New Southgate Opportunity Area to provide certainty on the amount of development that can be delivered. 9. Plan over relies on small windfall sites to meet housing targets, whilst underestimating the number of homes that could come forward within accessible and sustainable sites located in district town centres 10. Plan requires a clear balance between housing and employment land and must ensure that job creation is included as a key component of sustainable growth. 11. Plan requires clarification with regard to application of flood risk Sequential Test to spatial strategy and site allocations 12. Plan should ensure a variety of sites are identified within the Draft Local Plan, that are able to provide a variety of different types of housing. 13. Plan does not include a specific policy on “Other Large Sites” nor does it provide criteria or define what constitutes an “Other Large Site”. 14. Plan should support active travel and utilise the Strategic Walking network in making linkages with proposals. <p>Council’s strategy is justified</p> <ol style="list-style-type: none"> 15. Plan’s target of 2,364 net new homes a year (or 35,460 over the plan period) is considered the minimum required against Council’s own local assessment of need. 16. Council is in a relatively strong position as it can identify theoretical capacity for 46,000 homes compared to a local plan requirement for 35,460. 17. Plan sets out general presumption of brownfield first approach to delivering sustainable growth by focusing development within growth areas, district town centres and around transport hubs. 18. Plan is supported by the Infrastructure Delivery Plan (IDP) which identifies Barnet’s infrastructure needs comprehensively while highlighting some uncertainties around funding from Government departments that may affect how planning for future provision is considered.
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	<p>19. Table 5 has been updated to identify housing supply in each of the six Growth Areas. This helps support the CCG’s work with the Council to review healthcare infrastructure requirements in the Growth Areas, particularly Edgware Town Centre and Cricklewood.</p>
<p>Policy GSS02 : Brent Cross Growth Area</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Plan should reflect structural changes to the retail sector. This calls into question the appropriateness of a retail-led redevelopment at Brent Cross North. 2. Plan wording should refer to the relevant package of mitigation measures being determined on a case- by-case basis having regard to the tests of Regulation 122 rather than presumption that new/revised applications will be required to contribute towards retrospective costs. 3. Plan should reference unique opportunities of Brent Cross Growth Area. In particular, a location where site optimisation is supported. This includes suitability as a location for Build to Rent as well as being appropriate for tall buildings. 4. Plan implies that each development proposal in the Growth Area must meet all of the criteria listed, but some of the criteria will not be applicable to all proposals. <p>Council’s strategy is justified</p> <ol style="list-style-type: none"> 5. Plan supports the proposal to make walking and cycling the priority modes of transport in Brent Cross Town. This should be the default for all Growth Areas in the Borough. 6. Plan enables flexibility and correctly emphasises the need for coordination in the delivery of strategic parts of identified Growth Areas. 7. Plan sets out a long-term strategy for the Brent Cross Growth Area, including how it can support the creation of a new Metropolitan Town Centre at Brent Cross Town. 8. Plan sets out Council’s commitment to delivering Healthy Streets in Brent Cross Growth Area.
<p>Policy GSS03 : Brent Cross West Growth Area</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Plan needs greater flexibility in terms of the level of development acceptable, as well as how infrastructure will be delivered. <p>Council’s strategy is justified</p> <ol style="list-style-type: none"> 2. Plan sets out support for new and improved pedestrian and cycle routes to the new Brent Cross West. Safe cycling routes across the A5 and North Circular are vital to connect the Borough 3. Plan requires contributions towards both new and improved active travel routes to Brent Cross West station, as well as improved interchange, onward travel facilities and public realm outside the station.
<p>Policy GSS04 : Cricklewood Growth Area</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Plan’s stated objective of drawing upon the legacy of Raymond Unwin contradicts intensification of housing in this area. 2. Plan’s approach on new homes means that valuable local amenities such as health clinic, supermarket, historic pub (Lucky 7) cannot coexist with enormous number of new homes and tall buildings proposed. 3. Plan should (as in GSS03) seek contributions towards new/improved active travel routes to Cricklewood station, as well as improved interchange, onward travel facilities and public realm outside Cricklewood station.

<p>Policy GSS05 : Edgware Growth Area</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy is unsound as it’s not positively prepared in that it is not meeting area’s objectively assessed needs and achieving sustainable development in terms of reducing flood risk from all sources, river restoration and enhancement and the improvement of or planning contributions towards strategic flood infrastructure where necessary. 2. Policy should clarify expectations from proposals in and around the town centre in terms of contributing towards these improvements, such as cycle parking, station cycle parking, and Healthy Streets improvements. 3. Plan should focus first on reducing inefficient uses of land, such as car parking before regeneration of the town centre that involves transport land consolidations. 4. Plan’s use of percentage figures in the site allocations is overly prescriptive and may constrain housing delivery particularly as the quantum is expressed as a proportion of floorspace 5. Plan should extend the boundary of the Growth Area to include edge-of-centre locations, including 360 Burnt Oak Broadway which represent additional growth opportunities. 6. Policy should express housing target as a minimum. 7. Policy needs commitments for safe cycle routes and cycle storage within the area to reduce congestion and improve the pedestrian experience. <p>Council’s strategy is justified</p> <ol style="list-style-type: none"> 8. Policy will help improve transport interchanges and the public realm in Edgware through new development 9. Council’s strategy will support planning proposals that optimise residential density on suitable sites while delivering improvements to the amenity of the area within Barnet’s only Major town centre. 10. Council’s strategy reflects that Edgware is an important, sustainable location with the infrastructure to support the provision of new housing.
<p>Policy GSS06 : Colindale Growth Area</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Plan’s proposal for a pedestrian and cycle route will encroach on wild-life habitat on and around the Silkstream River. 2. Plan’s proposal to build 128 residential units on this strip of woodland does not meet needs of local community and destroys a comprehensively wooded area, with a mixture of long established planted and self-seeded trees, bushes and undergrowth. Tree removal will increase flood risk. 3. Plan is not positively prepared in that by not including appropriate reference to strategic flood infrastructure and river restoration, it is not meeting the area’s objectively assessed needs and achieving sustainable development 4. Plan inaccurately refers to a “<i>new station</i>”. The improvements will consist of a new ticket hall building as the platforms and much of the station infrastructure below ticket hall level will remain 5. Plan fails to take account of changing circumstances and new opportunities presented beyond the existing document and Colindale AAP. Grahame Park Way, and Avion Crescent in particular, are overlooked within CAAP 6. Plan is over-reliant on specific large and complex urban regeneration sites such as Colindale Gardens, Colindale Underground Station and the Public Health England.

	<ol style="list-style-type: none"> 7. Plan’s use of indicative capacity is based on rigid application of a density matrix. Indicative capacity of sites should be identified via a design led approach in accordance with new London Plan (2021) to enable the most appropriate density for the site. 8. Policy’s commitment to Healthy Streets should be the default for all parts of the Borough. Pedestrian and Cycle Routes should be built to LTN1/20 standards. Council’s strategy is justified 9. Plan will deliver a cycle path linking Colindale and Rushgrove Parks. This would have a positive and beneficial effect for the community. 10. Council’s general ambitions for growth within the Colindale Growth Area and improving Colindale Underground station with the help of developer contributions is supported.
<p>Policy GSS07 : Mill Hill East</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy does not properly consider that area is green belt, conservation area, home to wild-life and acts as a local carbon offset and should remain undeveloped. 2. Policy requires a strategic assessment of visual and functional impact of this Growth Area or a strategic master-plan to avoid a cumulative impact 3. Policy’s housing numbers should be revised based on Barnet's commitment to the GLA that "Development should not extend beyond the existing footprint of the buildings and should not impact the openness of the Green Belt" . 4. Policy should be revised to reflect include Waitrose site and car park. 5. Policy should reflect ‘urban’ rather than ‘suburban’ growth in order to better optimise opportunity to deliver new homes close to the station. Reference to “<i>good suburban growth</i>” is confusing in the context of Millbrook Park which comprises multi-storey apartment buildings presenting more of an urban than suburban face to Mill Hill East 6. Policy should be revised to ensure that an assessment of the impact of further large-scale development around Mill Hill East station is carried out. Taking into account cumulative impacts from all planned and proposed development because station has limited capacity and making the line to Finchley Central doubletrack is impossible. 7. Plan’s inclusion of Mill Hill East Station in Growth Area will impede expansion of train capacity. Thousands of homes are being built, e.g. on the Ridgeway, that are not within walking distance of station, that have reduced car parking spaces, with the expectation that people will be cycling. The station car park has only 42 car spaces, which could be converted to only 160 cycle spaces, so building on the station car park is unsound and not legally compliant. 8. Plan’s evidence (Green Belt and MOL Review) demonstrates no justification for releasing land or making significant revisions to boundaries. 9. Plan allows a three-fold increase in footprint at site 49. Development will remove site’s designation as Green Belt and destroy its permanence. Watchtower House site forms end of a continuous green corridor from gardens of Bittacy Park Avenue to Drivers Hill, a Site of Borough Importance Grade II, and is part of an important habitat. Increasing footprint or building volume or removing mature trees, will be detrimental to biodiversity. Replacement of hard-standing (e.g. tennis courts used as parking) by buildings three or more stories high, is not legally compliant in Green Belt.

	<p>10. Policy is very unspecific and open to interpretation. Improvements to public transport cannot take place if housing on the Mill Hill East station site prevents expansion.</p> <p>11. Policy through inclusion of site 49 in Growth Area removes the restriction on sprawl of the large built-up area of Mill Hill East into Mill Hill Conservation Area and towards Mill Hill Village. It damages the setting of the historic town of Mill Hill Village (an 'Area of Archaeological Significance').</p> <p>12. Policy through inclusion of site 49 removes the incentive for urban regeneration of Barnet's redundant office space. Non-compliance with Duty to Cooperate</p> <p>13. Council's response to GLA at Reg 19 was duplicitous (not duplicative) and non-cooperative because whilst para 5 was revised, para 3 was not revised to account for the reduction in the number of new residential units that could be delivered i.e. the figure of 547. Plan should reflect Mayor's statement on Site 49. Inclusion of the Watchtower site and Kingdom Hall site in the Growth area, goes against the Mayor's instructions.</p> <p>14. Plan should ensure vital land necessary for the operations and enhancement of London Underground and rail services – particularly the Northern line – are sufficiently protected....development proposals should contribute towards capacity enhancement at stations. Council's strategy is justified</p> <p>15. Policy requirement for proposals to be supported by a transport assessment is welcomed.</p>
<p>Policy GSS08 : Barnet's District Town Centres</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <p>1. Plan is unclear with regard to definition of town centres and the 800m extension to boundaries. Definition of the area encompassing the town centre target should be made clear and figure checked to ensure there is no duplication with targets under other headings.</p> <p>2. Plan requires a separate policy for North Finchley reflecting scale of change and growth planned (as evidenced in the adopted SPD) This can highlight specific matters for consideration in assessing any applications proposals, and importantly the infrastructure required to support coordinated revitalization</p> <p>3. Policy should clarify what is meant by the requirement that proposals "do not have a negative impact on areas outside of the town centre". Clarity is required as to what types of impacts are meant to be avoided.</p> <p>4. Policy should clarify the reference to car parking "established standards".</p> <p>5. Policy should clarify basis for figure of 5,400 new homes in town centres.</p> <p>6. Policy's intention appears to relate only to listed main town centres but uses the all-encompassing title of "Barnet District Town Centres". There is ambiguity between "District" and "Main" town centres.</p> <p>7. Policy should include noise-reduction targets [c] with regard to through traffic, which has a major negative impact on town centre appeal.</p> <p>8. Policy should support conversion of vacant shops in each town centre for secure cycle storage which would be especially attractive to owners of E-bikes and large adaptive cycles and cargo bikes. Council's strategy is justified</p>

	<ol style="list-style-type: none"> 9. Plan’s focus on main town centres such as Finchley Central and Golders Green is sound as they are adjacent to railway stations providing access to central London and elsewhere. 10. Policy requires the optimisation of residential density to make the most efficient use of brownfield land and take advantage of high levels of public transport accessibility. 11. Policy supports the Healthy Streets Approach and sets out intention to minimise parking provision including zero provision where appropriate.
<p>Policy GSS09 : Existing and Major New Transport Infrastructure</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy presumption that existing transport hubs have potential for growth without any evidence to assess whether the public transport provision will have the capacity to meet additional demand. An assessment should be included in the Plan of the potential extra traffic on the two branches of the Northern Line and Thameslink and the capacity of trains to cope with this extra traffic. 2. Policy should clarify relationship with other growth policies within the draft Local Plan. 3. Policy does not consider the options available for New Southgate if Crossrail 2 is not delivered. 4. Policy should re-instate Woodside Park as it provides two housing development opportunities on TfL land [Site Nos 55 and 56] with capacity to deliver 451 new homes, one of which already has planning permission. High Barnet station should be recognised as a prime, well-connected brownfield site, and specifically identified in GSS09 as a growth area for new development. 5. Policy should prioritise all public transport nodes for the optimal development of new homes. 6. Policy should focus car parking re-provision on a much smaller number of spaces for people with disabilities including ‘blue badge’ holders. Provision of multi-storey car parks is unlikely to be acceptable in design terms and can jeopardise scheme viability. 7. Policy should make distinction on car park redevelopment between stations at end of a line or on the edge of the TfL area and stations closer in. Commuters to London are drawn to High Barnet and New Barnet Stations because bus services have atrophied or disappeared, creating extra demand for car use and parking at and around those stations. This will displace cars onto local streets, discourage car-sharing and other integrated transport solutions. 8. Policy identifies potential for 950 new homes in proximity to the WLO stations but shows no specific sites and there is no justification that this is an appropriate figure which optimises site potential. Garrick Industrial Estate is next to WLO station at Hendon and has potential to accommodate a significant number of new homes as part of a co-location scheme. 9. Policy should be expanded to require all applications to be supported by an assessment of car use and a PERS (Pedestrian Environment Review) audit to maximise the efficiency of the surrounding pedestrian environment. 10. Policy considered contradictory in that replacement car parking may be supported through a more land-efficient design approach such as multi-story design. Developers need to understand exactly what is expected of them. 11. Policy support for development at Mill Hill East station site is incompatible with the requirement to “enhance the capacity, access and facilities of the transport interchange”. <p>Council’s strategy is justified</p>

	<p>12. Policy supports TfL’s programme for development in the Borough.</p> <p>13. Plan recognises that station car parks offer opportunities for residential redevelopment through utilising the high PTALs and other potential site characteristics such as town centre locations, and that level of station car parking provision will be assessed in light of encouraging the use of public transport and active modes of travel.</p> <p>14. Council’s approach supports proposals that facilitate access to—and delivery of—the West London Orbital at Hendon, as well as seeking contributions towards its delivery.</p> <p>15. Plan supports development and regeneration close to major transport infrastructure if safe cycling and walking routes are provided in the locality. Provision for safe walking and cycling routes, and secure cycle storage, should be supported at all new and existing transport hubs named in the policy.</p>
<p>Policy GSS10 : Estate Renewal and Infill</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy conflates estate regeneration with infill as these are two very different issues and approaches. Whilst there may be occasions where infill is appropriate, this should be decided on a case-by- case basis. 2. Policy of active estate infill will reduce access to green space and open space in the poorest and most densely populated parts of Borough with a disproportionate impact on women, older people, disabled people and people of colour. 3. Policy will widen health inequalities and is not consistent with the Joint Health and Wellbeing Strategy; the evidence and experience of the Covid pandemic; and the cross-border policies of NCL ICP. 4. Policy should objectively define the term “sufficient” open space and play space. 5. Policy should replace the phrase “promote” with “enable’ and include commitment to guidelines on Healthy Streets]. Reference to “appropriate level of parking’ sounds worryingly open-ended. <p>Council’s strategy is justified</p> <ol style="list-style-type: none"> 6. Policy supports active travel.
<p>Policy GSS11 : Major Thoroughfares</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy will add to traffic congestion along Barnet’s main road corridors unless the alternatives are much better. This means access to walking and cycling networks and installing safe cycle tracks directly along these corridors. 2. Policy does not include reference to the healthy streets for this section of the policy. Policies should look into a wider strategic approach. A5 is currently dominated by traffic and has poor quality public realm that would also benefit from the healthy streets initiative. 3. Policy should confirm that delivery of new homes is a minimum. This allows for flexibility and will maximise development potential and encourage the most efficient use of land. 4. Policy should clarify appropriate locations for tall buildings along Major Thoroughfares. 5. Policy should reflect that the characteristics of corridors is variable, in some cases offering more limited access to services and facilities, especially outside of town centres. Promotion of increased density and tall buildings should be focussed to where these corridors pass through town centres. 6. Policy is not effective as housing target for Major Thoroughfares has been reduced from Regulation 18 when Throughfares afford a significant opportunity to meet housing needs, and therefore the policy should be clear that this represents a

	<p>minimum aspiration.</p> <p>7. Plan’s support for development on the A406 North Circular is not as strong as it is for some other major roads through the Borough. It is unclear that Plan states that the A406 North Circular “could potentially be enhanced”. There is a need for a clear presumption in favour of the redevelopment of unused / underused sites in suitable locations on the A406 (subject to the usual planning, heritage and environmental considerations, of course). TfL has a number of sites along the A406 North Circular that were originally acquired by the DfT for road-widening projects which were never brought forward. A clear planning position in the Local Plan will help market these development opportunities through the GLA ‘Small Sites’ programme and secure their redevelopment.</p> <p>8. Policy should clarify that “substantial public transport investment” will not be required in all cases and that contributions should be proportionate to the scale of development.</p> <p>9. Plan considers the A110, East Barnet Road as a major thoroughfare and does not reflect its constraints. This stretch of road was not recognised by TFL in 2011 as one of the 1,703 major road links within Greater London with an annual average daily flow estimate of greater than 10,000 vehicles.</p> <p>Council’s strategy is justified</p> <p>10. Policy identifies that redevelopment along Barnet’s main road corridors can provide a significant supply of sites for growth because they benefit from the public transport facilities that run along them.</p>
<p>Policy GSS12 : Redevelopment of Car Parks</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <p>1. Policy proviso that car parking spaces will be released ‘if surplus to requirements or re-provided’ will not deliver the sort of change needed to achieve other policies on active travel and climate change.</p> <p>2. Policy needs to consider implementation through Site Proposals. There are 141 residential premises, 49 businesses, two schools and two churches which rely on approximately 60 car parking spaces at Burroughs Gardens car park (site 34) and The Burroughs car park (site 39). The Good Growth policies of the London Plan emphasise the need to protect character and heritage. The proposals by virtue of their size, scale and density pose major threat to the character and heritage of the area.</p> <p>3. Policy criteria includes design that ‘preserves’ the amenity of neighbouring uses. Question whether ‘preservation’ is the correct test for this policy and should be replaced with ‘has regard to’ the amenity of neighbouring uses.</p> <p>4. Policy is bullish about redevelopment of car parks which do represent an inefficient use of land in prime locations. However, Council is also committed to supporting commercial well-being of town centres, which have endured many difficulties over recent years. Policy should be far more cautious about potential damage to commercial viability of town centres. Elements regarding alternative means of transport and re-provision after development should be replaced with a requirement for an analysis of the potential impact on the well-being of any nearby commercial activity.</p> <p>5. Policy does not consider that car parking need in edge-of-London locations can be greater than elsewhere in Barnet, as centres such as Chipping Barnet have to compete with Potters Bar, Hatfield, London Colney and Borehamwood, which are easier to reach by car. Policy should require transport assessments for edge-of-London locations to factor in developments outside Borough.</p>

	<ol style="list-style-type: none"> 6. Policy wording could still give much stronger encouragement to remove or reduce parking as part of redevelopment proposals particularly where sustainable alternatives exist. Re-provision should only be considered where it is essential e.g. for disabled persons parking or for operational reasons. 7. Council's approach will make life harder for residents in a Borough which the Council acknowledges is car-dependent. Lateral cross borough public transport is limited and many people, especially the elderly and people with young children, depend on their cars for many journeys. There will be an especially negative impact on disabled people and is out of line with the council's equalities duties Council's strategy is justified 8. Council's approach to redevelopment of existing surface level car parks for residential and other suitable uses is supported particularly with low-density retail parks and supermarkets. GNLP currently includes a large surface car park which provides parking for the leisure facilities on the site. 9. Policy supports making the most efficient use of land, with specific levels of car parking to be appropriately determined at subject to the nature of the development and the uses which are proposed. 10. Council's approach to redevelopment of car parks, particularly in well-connected locations, will make a more efficient use of land to address London's housing crisis and reduce congestion at the same time.
<p>Policy GSS13 : Strategic Parks and Recreation</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy does not include specific proposals on how Regional Park will be delivered. 2. Policy should focus on local access to natural spaces, pocket parks, and local play spaces as these are more important to people's quality of life, health and wellbeing and activity levels than large strategic parks and recreation centres. They also help to protect against urban heat islands and flash floods. 3. Policy should consider equalities issues, specifically the work of Make Space For Girls, and inclusion of disability sports and respect the child's right to play 4. Policy is ambiguous in that it may permit indoor facilities to be built in a new Regional Park on Green Belt (GB) and Metropolitan Open Land (MOL). Structures such as car parks, tennis courts and visitor centres could be built in the name of 'access', thereby affecting the openness and permanence of the GB, so that part of the GB or MOL becomes a brownfield site. Council's strategy is justified 5. Council's approach of developing strategic parks at King George, Copthall and West Hendon with dedicated cycling routes is supported.
<p>HOUSING</p>	
<p>Policy HOU01 : Affordable Housing</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy does not provide any clarity on the application of First Homes. 2. Policy does not confirm/clarify that a lesser provision would be appropriate if a viability appraisal demonstrates a proposal would not be viable if affordable housing was provided to meet policy requirement. 3. Policy should support a flexible approach on affordable housing tenure mix, subject to the site specific circumstances. 4. Plan's evidence base on viability for specialist older persons' housing typologies is reliant on the London Plan. However

	<p>London Plan’s approach, particularly in respect of development viability and affordable housing contributions, is not considered to be consistent with that of the NPPF (2021). It would be more appropriate to set a lower, potentially nil, affordable housing target for sheltered and extra care accommodation as the London Plan was assessed against NPPF (2012) and Barnet Local Plan will be determined against NPPF (2021), with its increased emphasis on robust viability assessments at the plan making stage, it is the Borough’s responsibility to ensure its planning obligations regime is sufficiently robust and justified.</p> <ol style="list-style-type: none"> 5. Plan fails to explain why the target for affordable housing has been lowered to 35%, particularly when the London Plan has demanded a higher target of 50% affordable housing. 6. Plan fails to reflect that high housing costs are main reason why a higher percentage of families on a low income are living beyond their means than in any other London borough. Policy would fail an equalities impact assessment as levels of child poverty are significantly impacted by housing costs. 7. Plan should clarify what Affordable Rent is as an affordable housing product. 8. Policy should reflect the specific viability challenges to bring former utility sites forward to ensure redundant brownfield sites fulfil their potential and contribute to an areas housing need. Policy should make reference to exceptional cases such as this, where a more flexible approach may be needed and reflect London Plan which highlights the unique challenges of former utility sites. 9. Policy should be more robust and clearly state that the Council will not accept less than 35% without convincing reasons. The supporting text should give examples of convincing reasons. 10. Policy fails to make reference to London Plan (2021) Policy H5 and the associated supporting text does not explicitly confirm whether LB Barnet will implement the Mayor’s Fast Track approach to viability in accordance with the London Plan (2021). Supporting text fails to set out how Barnet will assess the viability and affordable housing offer of scheme that achieve or exceed the affordable housing target. 11. Plan provides limited detail on the affordable housing requirements for BtR development beyond reference to London Plan Policy H11 (Policy HOU06, part b). Plan provides no such clarity on what is considered to be a genuinely affordable rent, and we request this is included so that the Plan provides certainty in respect of BtR development. 12. Policy is unclear about Specialist Older Persons Housing (SOPH) It should be consistent with the London Plan, which clarifies that affordable housing policies do apply to SOPH. <p>Council’s strategy is justified</p> <ol style="list-style-type: none"> 13. Policy is clear that the provision of affordable homes is subject to viability. 14. Council’s approach to support safe, strong and cohesive communities and improve the quality of housing in Barnet and deliver a range of homes and increase access to affordable, good quality homes is supported. 15. Policy helps support approaches to secure housing for critical key workers on land owned by Government departments and agencies.
<p>Policy HOU02 : Housing Mix</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy is not based on need or demand. Having a policy requiring a high percentage of large units would only increase significant competition for smaller units and lead to more affordability issues – this has not been thought through properly.

	<ol style="list-style-type: none"> 2. Policy's proposed mix does not take into account projected increase in single person households who would be forced to live in HMO accommodation which is not a good standard of accommodation. 3. Policy does not give flexibility to provide smaller units in town centre locations where large family sized dwellings would not be appropriate. 4. Policy and associated supporting text fails to set out a clear definition of LB Barnet's approach to assessing dwelling mix. 5. Policy does not give flexibility to provide smaller units where the provision of amenity space is challenging – amenity space is more important for family sized dwellings. 6. Council's approach should clarify policy as a requirement or an ambition for the Borough. Policy sets out what is no more than a set of aspirations. It does not adequately require compliance at the level of the individual development. Contrast with TOW04 and CHW04, where it is made clear that applications which are non-compliant " will be refused" 7. Policy states that the dwelling size priorities will be subject to periodic review and update. Council cannot change the policy until it undertakes a review of the Local Plan. 8. Policy should clarify innovative housing products. 9. Policy should be revised to enable a flexible and end-user driven approach to housing mix when considering comprehensive redevelopment proposals. 10. Policy needs to reflect that specialist older persons' housing cannot provide a mix of house types in-block. 11. Plan should identify a sufficient supply and mix of sites (both greenfield and brownfield) to provide a range of housing mix and types across the Borough. Green Belt sites are often better suited to deliver family homes which is further reinforced by the character of the surrounding area of the site. 12. Council's current strategy will deliver a surfeit of flatted accommodation which will not meet the needs of the Borough. 13. Council's approach to housing mix requires private homes to be predominantly three bedroom and omits any provision of one-bedroom homes, even if they are delivered as part of a mixed development. This is not in conformity with London Plan. 14. Plan expresses general support for BtR, however application of this policy would pose significant viability challenges to actually delivering it. If Brent Cross Growth Area is to meet the delivery timescales set out in the Plan, and in order to be a mixed and balanced community overall, it will need to include a range of residential types and products, especially BtR. 15. Plan should reflect impact of COVID19 pandemic and changes in our preferences to living. People are now spending longer at home due to amended working practices. The direct implication of this is people are reconsidering where they live. People are increasingly looking for an extra bedroom as a workspace environment and outdoor space. 16. Policy housing mix preferences do not align with delivery in regeneration areas. Heavy dependence upon high-density apartment living does not align with the overarching vision of the emerging Local Plan to "be a place that is family friendly"; "a place where people choose to make their home", and a place with a "range of housing types". 17. Plan should provide encouragement to more varied – and newer – forms of tenure, e.g. co-housing. 18. Policy clear that developments are expected to have regard to the guide dwelling size priorities set out in Table 6. However rigid application of these requirements may not be acceptable or appropriate in all cases. 19. Policy recognises the need for family housing but it is unenforceable and as such meaningless. Developers are reluctant to
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	<p>build three bedroom homes as they believe they are less profitable than studio and one bed flats and will typically only be included as part of the social housing requirement.</p> <p>20. Policy fails to recognise that due to the unaffordability of housing, children are living much longer in the parental home including adult children (over 18).</p> <p>21. Policy should include specific requirements for developments of more than 150 homes to provide the mix of homes detailed in the policy and supported by the Strategic Housing Market Assessment and that these requirements cannot be offset with financial payments.</p> <p>22. Policy does not take account of Specialist Older Persons Housing. Housing needs (in terms of unit sizes) of older persons are different to those of younger households.</p> <p>23. Council strategy has failed to provide larger family units, and stop the continuing loss of existing ones. This threatens the status of the Borough as a highly desirable place for families to live.</p> <p>24. Policy does express the aspiration to provide more larger family homes but lacks any measures to make this happen. Should be a requirement that sizable developments should offer larger family homes and if they fail to do so then planning consent will be refused. Stronger controls on height could shift commercial appeal from building flats to making provision of houses more attractive.</p> <p>Council's strategy is justified</p> <p>25. Council's approach ensures that the right homes are delivered at the right place in the Borough, taking account of site-specific context, and is therefore considered to accord with the NPPF.</p> <p>26. Policy confirms that housing trends in Barnet are at variance with the wider London requirement insofar as it relates to housing mix. The Mayor's SHMA 2017 highlights that one bedroomed units are the largest requirement for market as well as social rented housing in London. This contrasts with the findings of Barnet's SHMA published in 2018, which confirms a requirement for family housing.</p> <p>27. Plan emphasises the importance of balance, rather than placing an over-reliance on smaller properties.</p> <p>28. Policy sets a priority to the provision of 3-bedroom units.</p> <p>29. Policy recognises that site size, characteristics and location are relevant to devising appropriate housing mixes. Local development context should be regarded as a key influence on housing mix, with different parts of the Borough demanding a range of approaches in order to deliver the right mix in the right locations. This aligns with the design-led approach to optimising site capacity.</p>
<p>Policy HOU03 : Residential Conversions and Redevelopment of Larger Homes</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <p>1. Policy is wholly unreasonable and acts as a barrier to the efficient use of land and providing higher density development, in the majority of the Borough.</p> <p>2. Policy mainly seeks to protect the character and amenity of local areas, but character and amenity are protected by other policies.</p> <p>3. Policy introduces a raft of criteria which does not allow common sense or meaningful assessment to be carried out.</p> <p>4. Policy does not reflect that many successful conversions and redevelopment sites are outside 400 metres of local shops and</p>

	<p>public transport.</p> <ol style="list-style-type: none"> 5. Policy does not justify a family sized dwelling in a conversion at ground floor level. If provision of a 3-bedroom unit on upper floors includes access to sufficient amenity space then this should be supported. 6. Policy needs to reflect that most large houses are an inefficient use of floorspace and are only affordable to the very affluent (in Barnet). Policy as it is currently worded is discriminatory against all those except the very affluent. A definition of larger homes should be provided to ensure only efficient 3–5-bedroom houses are protected. 7. Policy should consider provision of adequate and affordable cycle storage both on site and with on-street cycle hangars. 8. Policy is overly restrictive and will limit opportunities for redevelopment in locations which can be reasonably considered to be sustainable. It is contrary to the principles of Chapter 11. Making Effective Use of Lane in the NPPF. 9. Policy not effective in resisting the trend towards smaller family homes. The identified housing need in the borough is for three bedroom family homes (preferably houses with gardens). 10. Policy needs to reflect TRC03 where car parking requirements are expressed as maximum not minimum provision. Given that suitable sites should be within 400 metres walking distance of a town centre or in an area with a PTAL of 5 or more, residential conversions should be car free with provision only for disabled persons car parking (although cycle parking should meet minimum standards). 11. Plan asserts that a two bedroom flat can be regarded as a family home for four persons, and as many of these are being built, the evident concern is about family homes suitable for five persons or more. Something stronger and more precise is needed. We recognise the value of the constraints introduced by clauses (a)(d) (e) (f) and (g). But clause (b) will not only fail in its objective, it could make it easier for developers to secure approval for conversions by proposing that a gross internal area of 74sqm is an adequate minimum. Clause (c) needs a more precise definition of what 130sqm refers to. Council’s strategy is justified 12. Policy seeks to protect the character and amenity of local areas and seeks to protect larger existing homes subject to conversion.
<p>Policy HOU04 : Specialist Housing</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy is unreasonable. Many successful homes are outside 400 metres of local shops and public transport and provide care for people who cannot travel. 2. Policy should clarify evidence required to demonstrate an identified need. 3. Policy should clarify what is a harmful concentration of such a use in the local area) of the HMO section (part 2D) of the Policy should clarify HMO’s to be easily accessible by public transport, cycling and walking. 4. Policy should clarify non self-contained market housing 5. Council’s approach should support the supply of the full range of types of older persons housing that is needed and encouraged by the London Plan. Plan does not cover all the types of older persons housing that London Plan policy H13 has been devised to support and has misunderstood the intention behind London Plan policy H13, which is to increase the supply of a wider type of older persons housing, including retirement housing, not just accommodation providing an element of care.

	<ol style="list-style-type: none"> 6. Plan’s terminology from the SHMA which utilises the methodology employed to assess need by the Housing the Housing LIN Older People Resource Pack 2012. SHMA uses different terminology in part to Housing Lin and this is misleading - refers to “Traditional Sheltered” whereas Housing LIN refers to “Conventional sheltered housing to rent” - refers to “leasehold Schemes for the elderly” whereas Housing LIN refers to “Leasehold sheltered housing”. 7. Policy requires older persons’ housing to demonstrate an identified need to help people live independently. This need is however self-evident and has already been established as significant in both the London Plan and the Barnet SHLAA 8. Policy is undermined by the lack of consideration given to older persons’ housing typologies in Policy HOU 01: Affordable Housing and the Barnet Local Plan Viability Study Report. 9. Policy should set out more specific requirements for the location of this specialist housing and provide further clarity on how this target will be met. 10. Plan requires a specific policy to deliver specialist older persons homes. Having a clear policy against which delivery in this sector can be tracked is therefore essential. Policy should provide further clarity on the types of specialist housing for older people, the appropriate locations for this form of development and how the figure will be met within the Plan period. 11. Plan should include policies to manage the delivery of SOPH, including identifying sites to accommodate this need. Policy is confusing and muddled in respect to SOPH, which makes it ineffective in principle. Proposed site allocations should identify specific sites that are suitable to accommodate residential development (both conventional housing and/or SOPH), in order to accord with the London Plan. 12. Policy should clarify that general needs housing ‘standards’ (e.g. car parking, cycle parking, playspace, housing mix etc) should not be bluntly applied to SOPH where it can be demonstrated that an alternative bespoke approach would be more appropriate. Council’s strategy is justified 13. Plan reflects indicative benchmarks for older persons housing from the London Plan. 14. Policy supports alternative types of living accommodation, which should be directed, in part, to town centre locations given the access to services and facilities.
<p>Policy HOU05 : Efficient Use of Barnet’s Housing Stock</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy is contradicted by HOU03 to stop conversions and redevelopment in most of the borough. 2. Policy seeks to try and stop such provision of much needed short term temporary accommodation. Council should outline where they would support the provision of temporary accommodation. 3. Policy states that Council will utilise it’s regulatory powers to reduce the number of vacant dwellings and bring them back into use.” – this is not a policy but a statement of intent which is not related to planning. 4. Site proposal 49 involves loss of existing volunteer residential accommodation (for which there is no longer a need) to be replaced with new housing (for which there is a need). This conflicts with HOU05 as none of the exceptions set out at 1(a-d) would apply.

<p>Policy HOU06 : Meeting Other Housing Needs</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy unclear if build to rent schemes are exempt from providing a mix of dwellings 2. Policy that self and custom-build is delivered through a Neighbourhood Plan is not considered to be a sound approach and simply delays the identification of sufficient sites to meet this need.
<p>Policy HOU07 : Gypsies, Travellers and Travelling Showpeople</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Plan has not made a reasonable assessment of need, based on credible evidence. No significant objectivity has been used by the authority in its assessment. 2. Policy may be politically realistic to some, but it is not fair or inclusive. There is no appropriate strategy, 3. Policy evidence GTAA jointly-written supporting document is unsound. Its methodology may be partly questionable in the case of the other contributing London boroughs, but at least they have existing traveller pitches to allow interviews by researchers. Barnet has no existing traveller pitches and must have been delighted by the chosen methodology, endorsed by the borough, of interviewing non-existent people! There is, therefore, currently no opportunity for reasonable democratic comment by the public on multi-authority methodology. The GTTA manages to say: “There were no Gypsies, Travellers or Travelling Showpeople identified to interview in Barnet.” “Following efforts that were made, it was not possible to interview any households living in bricks and mortar in Barnet.” “There are no public sites in Barnet so there is no waiting list.” “There were no households identified to interview in Barnet, so there is no current or future need for additional pitches for households that met the PPTS planning definition.” “There were no Travelling Showpeople identified in Barnet, so there is no current or future need for additional plots under the PPTS or Draft London Plan definition of a Traveller.” 4. Policy support through the ‘GTAA Update’ is a last-minute defence for protecting the authority’s unbending, long-term attitude to travellers.
<p>CHARACTER, DESIGN & HERITAGE</p>	
<p>Policy CDH01 : Promoting High Quality Design</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Plan needs to protect the Burroughs and Church End conservation areas from unsympathetic development, by reducing the scale, size, and massing of the proposed new student accommodation/residential homes in this highly residential area. 2. Policy should support proposals that creatively recycle, remodel and reuse existing buildings on site. 3. Emphasis on the flexibility of design-led approach should be emphasised on a site- by- site basis. 4. Council states intention to produce a design SPD but there is no commitment regarding what form this might take. Given Mayor’s recognition of the issue, and the Govt’s aspiration to markedly improve design quality, the local approach needs to radically change. Design guidance in Barnet is currently insufficiently clear and consistent. 5. Policy must clarify value of timely design review and the role of local design codes, not simply for small sites. Explicit mention of energy saving would also be helpful. 6. Policy can be better worded to ensure full consistency on national policy in regard to optimising sites for residential development and ensuring well-designed places. Limitations on land supply and availability within the borough are clearly highlighted through the proposed Plan. This includes Green Belt and Metropolitan Open Land and the drive to protect and enhance heritage, environmental and social assets wherever possible. This means that use of available land must be as

	<p>efficient as possible, particularly in order to deliver more than 5,000 homes (almost 15% of the overall minimum housing target over the life of the Plan) from non-designated sites.</p> <ol style="list-style-type: none"> 7. Policy not clear that optimisation could include alternative forms of housing provision (for example, flats or apartments) in locations previously characterised by houses. Shift in emphasis needs to be specifically stated so that any residential development proposal can be assessed in terms of optimisation through overall design and character and not simply whether the specific form of housing is unchanged from previously. 8. Council's strategy should include a Design Review Panel of qualified individuals to review all schemes over a certain size or in sensitive locations. Additionally, as indicated in D4 of the London Plan, design review should be part of the public consultation process. 9. Policy makes no reference to fire safety. Council's strategy is justified 10. Supportive of the principle of a design-led approach to deliver optimum density on sites. 11. Policy is helping to deliver Secured by Design in Barnet, it can greatly enhance the safety and security of those using or residing within a development and the wider environs of the local community, by using proven crime prevention measures at design, planning stage.
<p>Policy CDH02 : Sustainable & Inclusive Design</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy is contrary to national policy as it requires compliance with a BREEAM 'Very Good' rating rather than adhering to the Building Regulations as the standard measure for building performance. 2. Policy should clarify that the M4(3) requirement should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. 3. Plan needs to be ambitious about well-designed homes that are designed to minimise the impact on climate change. New buildings should be built to BREEAM of at least Excellent. Council's strategy is justified 4. Policy commitment to sustainable design and the BREEAM method is supported. 5. Supportive of providing sustainable and inclusive developments which are accessible to those with disabilities.
<p>Policy CDH03 : Public Realm</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy might benefit from a requirement for public realm plans to incorporate strategies that seek to prevent littering and fly-tipping. 2. Policy needs to set minimum acceptance criteria for healthy streets scores. Barnet performed poorly in the recent Healthy Streets Scorecards at 24th place. 3. Policy could help proposals deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. Site at Avion Crescent in Colindale could do this. Council's strategy is justified 4. Plan's objective to deliver high-quality, inclusive and effective public realm as part of development proposals to contribute to the delivery of placemaking, social interaction and the health and wellbeing of residents is endorsed.

<p>Policy CDH04 : Tall Buildings</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy is open to misinterpretation. It would be better to define tall (and very tall) buildings in relation to their immediate surroundings, to be more sensitive to the local character of an area. 2. Policy does not conform with London Plan, which requires that appropriate heights (as well as locations) of tall buildings are defined in boroughs development plans. Whilst SPD can contain further detail on heights, this would not form part of the Plan. 3. Policy is ambiguous, both with regard to the nine strategic locations identified in CDH04 and those site allocations where tall buildings are also identified as potentially appropriate. Important that the full extent of potential adverse impacts of such proposals on the historic environment are understood at a stage in the plan-making process early enough to ensure they are avoided. 4. Policy criteria for assessing proposals should consider neighbouring low rise residential properties. 5. Policy’s flexibility is not consistent with London Plan Policy D9. CDH04 does not provide sufficient clarity on the likely locations of very tall buildings and their potential height. 6. Policy does not identify Mill Hill East, the only Growth Area where tall buildings are not identified, missing the opportunity to optimise development. 7. Policy supported in terms of siting within an Opportunity or Growth Area. However proposal site 27 should show that this site is an “appropriate siting” within the Edgware Growth Area for very tall buildings. 8. Policy should be revised so that Major Thoroughfares are considered as appropriate locations for Very Tall Buildings as well as Tall Buildings. 9. Plan nor the Changes to the Policies Map (Reg 19) identify locations for tall buildings, and this is inconsistent with London Plan Policy D9 and therefore not considered sound. 10. Policy explains that tall buildings of 15 storeys or more (‘Very Tall’) are not to be permitted unless exceptional circumstances can be demonstrated including appropriate siting within an Opportunity Area or Growth Area. District Centres should also be specifically referenced, especially as some Growth Areas represent smaller town centres than District Centres such as North Finchley. 11. Plan has failed to recognise the weight of 2020 appeal decision by the SoS for NLBP which found that the site is appropriate for buildings up to 9 storeys. Council has consistently failed to recognise the full potential of the site including not identifying the NLBP site as an area where tall buildings may be appropriate. 12. Policy identifies New Southgate Opportunity Area (NSOA). However the boundary of the NSOA needs to be clearly defined, to provide certainty for developers with regard to appropriate locations for tall buildings. 13. Policy refers to ‘buildings of 8 to 14 storeys’ which may be appropriate at strategic locations only, including West Hendon which is neither an Opportunity Area or Growth Area but West Hendon still forms part of the adopted Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework SPG. Evidence base does not reflect the practical implications of the extant planning permission and the physical development on Site. CDH04 is inconsistent with this permission. 14. Policy criteria make no reference to access to public transport. It does not refer to the enhanced opportunities provided at
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	<p>areas in proximity to the West London Orbital (WLO) stations as well as their closeness to recently permitted tall buildings along the A5. Policy should identify Hendon Station as a strategic location for tall buildings.</p> <ol style="list-style-type: none"> 15. Policy requires greater clarity with regard to 'appropriate siting'. It is assumed that this means compliance with the criteria listed in Part (e), in which case the words 'appropriate siting' are not required. 16. Policy should clarify whether location within an OA or Growth Area would alone be sufficient to demonstrate 'exceptional circumstances.' 17. Policy omits any future opportunity for any tall building to come forward within other town centre locations and sets a blanket approach for all town centre sites. It therefore undermines Mayor's policies which seek optimised growth and housing delivery on 'suitable brownfield sites within 800m of town centre boundaries' and contradicts CDH01 18. Mayor notes that Barnet defines a category of 'very tall' buildings of 15 storeys or more in Policy CDH04. It would be helpful if the policy clarified if the appropriate locations for 'very tall' buildings is the same as for tall buildings, or is a sub-set of those locations. 19. Policy fails to identify Major Thoroughfares on a map with appropriate heights and is too vague to fully comply with London Plan Policy D9. Map 4 should show Major Thoroughfares as Strategic Tall Buildings Locations due to the identified potential of these locations for infill and intensification, whilst being supported by good transport infrastructure. 20. Policy will restrict significant public realm and townscape improvements sought by the Council at Finchley Central (site 30) from an appropriate and viable scale of development (likely to include very tall buildings). 21. Plan needs a more nuanced and localised definition of tall buildings that would protect low-rise neighbourhoods, where anything over four storeys might appear tall. 22. Policy undermines one of Barnet's key objectives: "To conserve and enhance the historic environment of the Borough, particularly the distinctive character and identity of Barnet's town centres and suburbs" 23. Policy makes no reference to safety which is a fundamental aspect to any development 24. Policy does not consider water courses, artesian wells, that are prominent in town centres, and impact the structural integrity of developments and impacts neighbouring buildings 25. Policy suggests medium build are more sustainable, and cost less. Why not have a Medium building policy? 26. Policy should consider ground water flow as a factor in the relationship between the building and the public realm, as this can have an adverse environmental impact on neighbouring buildings 27. Policy should require developers to support agreed investments/solutions within the local area ensuring meaningful character is kept. These should be clearly explained during the planning process so that the local community affected by the tall buildings, can understand how their needs are being considered 28. Policy fails to set out any reasonable justification as to why tall buildings are defined as being between 8 and 14 storeys and why very tall buildings are defined as being 15 storeys and above. It is inappropriate to set a singular definition for a tall building and for a very tall building for the entirety of LB Barnet. 29. Plan's principle that tall buildings should be confined to certain designated areas and should be turned down in other places is supported. However policy should consider a building "tall" if it more than six storeys.
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	<p>30. Policy implies that buildings of eight storeys or more could be considered suitable for the Great North Road which passes through the low-rise outer suburb part of our borough for which eight storey buildings are completely inappropriate. As Barnet is predominantly low rise, the council needs to assess all areas of the borough to set an upper limit for each area so that inappropriate planning applications for tower blocks – such as the North London Business Park – would fail.</p> <p>Council’s strategy is justified</p> <p>31. Plan identifies that tall buildings may be appropriate in specified strategic locations, including along a Major Thoroughfare, such as the A5 Edgware Road. This approach is supported so to make best use of land in a sustainable location and to reflect the evolving character of this corridor.</p> <p>32. Council’s approach is consistent with London Plan Policy D3 which seeks to ensure that site capacity is optimized through the design-led approach, particularly in well-connected locations.</p> <p>33. Policy is considered sound and compliant with aims of the NPPF particularly those relating to the protection and conservation of the Natural Environment.</p>
<p>Policy CDH05 : Extensions</p>	<p>No Responses</p>
<p>Policy CDH06 : Basements</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <p>1. Policy can be strengthened by requiring all basement development to incorporate a positively pumped device or other suitable flood prevention device to avoid the risk of sewage backflows which can cause sewer flooding.</p>
<p>Policy CDH07 : Amenity Space & Landscaping</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <p>1. Plan fails to address widespread conversion of front gardens into driveways [outside of conservation areas].</p> <p>2. Supporting text gives the impression that front garden conversions to hardstanding will be refused where there is harm to character and appearance of a conservation area and where garden development is considered to be detrimental to local character. However this is not followed through into policy prescription which is weak.</p> <p>3. Policy should do more to protect all existing trees and hedges and safeguard their root systems during development. Plan should support the Great North Road Hedge to create a continuous green corridor.</p> <p>4. Policy with regard to “where site constraints make it difficult to provide private outdoor open space that offers good amenity for all units” is considered to be too vague and unimplementable. It needs a clear and measurable metric.</p> <p>5. Policy not considered justifiable in terms of requiring a financial contribution if policy compliant levels of playspace are provided as part of an application.</p> <p>6. Policy not considered justifiable in terms of biodiversity net gain of at least 10%</p> <p>7. Policy requires a contribution to off-site provision where amenity space in a new development is inadequate. Unless the off-site provision is new or enhanced such a contribution merely helps the Council’s maintenance budget, does not improve the amenity space available to the dwellers in the new development and does not therefore meet the purpose of the policy.</p>
<p>Policy CDH08 : Barnet’s Heritage</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <p>1. Policy advises that conservation area character appraisals and where applicable, conservation area-based design guidance will be used in the assessment of planning applications. Council should commit to and commence a review and update of all</p>

	<p>Appraisals to ensure applications are appropriately assessed.</p> <ol style="list-style-type: none"> 2. Policy as a whole could be made more straightforward through the removal of the first two overarching paras, which in effect repeat text elsewhere. 3. Plan leaves non-designated designed landscapes of heritage value unprotected from the impacts of development either within the open space or, arising from development outside. There is a discrepancy between the HE advice and the Barnet local list criteria relating only to buildings and structures. This leaves cultural landscapes, as defined by HE unrecognised and therefore unprotected in Barnet. 4. Policy fails to consider the borough’s heritage assets of designed landscapes such as parks, gardens, squares, churchyards, cemeteries and other sites of historic interest. 5. Plan’s proposals for the Hendon Hub, by virtue of their size, scale, and density pose major threats to the character and heritage of the area, as outlined in the 2011 and 2012 Character Appraisals for The Burroughs and Church End. Proposed developments provide no public benefit to residents. 6. Policy at clause (i) in relation to conservation areas is not clear in what it is directing the decision maker to do, when a proposal is submitted as part of a planning application. It suggests through the wording “will be resisted” that there is a policy objection to demolishing buildings, which are considered to make a positive contribution to the character or appearance of a conservation area. The wording of the policy indicates that the Council’s starting policy position is to resist demolition of buildings that are considered to make a positive contribution to the character or appearance of a conservation area per se. Council’s strategy is justified 7. Supportive the overall thrust of proposed Policy CDH08 which is reflective of the relevant statute and NPPF and PPG. 8. Policy sets out a helpful understanding of the borough’s current position in relation to the historic environment.
<p>Policy CDH09 : Advertisements</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy is in part more relevant to the section on public realm and reducing street clutter rather than on any advertisement which may utilise existing street furniture. 2. Policy that “shopfront advertisements will generally only be acceptable at the ground floor level, at fascia level or below” is unrealistic and unduly restrictive. 3. No reference is currently made to the Strategic Road Network or Highways England within this Local Plan policy. Highways England should be consulted on any advertisement proposals close to the SRN and Highways England will need to consider its location, if visible from the SRN, its size, brightness/lighting (if any) and its effect on public safety. 4. The display of advertisements is subject to a separate consent process within the planning system. This is principally set out in the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.
<p>TOWN CENTRES</p>	

<p>Policy TOW01 : Vibrant Town Centres</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy should state explicitly that town centre policy is underpinned by reducing car dominance in the town centre; and promoting sustainable travel to / from the town centre. 2. Policy fails to recognise that town centres are unattractive because they are dominated by polluting, noisy and dangerous traffic. 3. Policy requirement for a sequential and impact assessment for replacement/re-provision of main town centre uses in out of centre locations should be revised to exclude established locations if there is no net uplift of on-site main town centre uses. 4. Policies on town centres do not reflect the reality of the contraction of retail recent changes to classifications (the majority of commercial properties now in Class E). If the aspirations in the policies are to be sustained there needs to be reference to more robust protection such as using Article 4 Direction wherever possible. 5. Policy should be revised with regard to Brent Cross expressly to refer to residential accommodation forming part of the mix of uses provided. reference to Brent Cross in Part (a) should be Brent Cross Growth Area. 6. Policy needs to acknowledge existing retail parks in accessible locations as sequentially preferable sites for main town centre uses. 7. Policy fails to acknowledge that the sequential test should be proportionate to the scale and nature of a proposal. Furthermore, the proposed threshold of 500sqm is significantly below the national threshold of 2,500sqm as set out in para 90 the NPPF and is unjustified. 8. Plan must set out a strategy for implementing the policies in TOW01, TOW02 and ECY01. The Council must devise and set out a strategy for implementing these policies in the context of the new Permitted Development rights and para 53 of the NPPF.
<p>Policy TOW02 : Development Principles in Barnet’s Town Centres, Local Centres & Parades</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy part (h) of the policy is unsound because it conflicts with national policy and regulations. New PDR applies to buildings which have been vacant for at least three continuous months immediately prior to the date of the application for prior approval. Nor is there any requirement in national policy for evidence of continuous marketing over a 12-month period. Given the shortages in housing supply in London compared to need, these restrictions are doubly unjustified. 2. Policy should support converting vacant retail units for use as cycle hubs.
<p>Policy TOW03 : Managing Hot Food Takeaways, Adult Gaming Centres, Amusement Arcades,</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy should reference, and be in accordance with, Barnet’s Joint Health and Wellbeing Strategy. 2. Policy should consider impact on crime and antisocial behaviour 3. Policy should require installation of fat traps to prevent blockages and protect Thames Water’s assets within the Borough.

<p>Betting Shops, Payday Loan Shops, Pawnbrokers & Shisha Bars</p>	
<p>Policy TOW04 : Night-Time Economy</p>	<p>No Responses</p>
<p>COMMUNITY USES, HEALTH & WELLBEING</p>	
<p>Policy CHW01 : Community Infrastructure</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy should reflect the role of specialist older persons’ housing in improving the health and wellbeing of the Borough’s elderly 2. Policy does not offer the same level of support for development at schools to correspond with para 95 of the NPPF. 3. Policy evidence base (Indoor Sport and Recreation study) identified need for increased pay-and-play accessible water space by 2036 but the four sites are not in town centres or easily reached by sustainable transport. Safe cycling routes and good public transport needs to be provided. Having to wait until 2036 for increased provision is unacceptable. 4. Policy on assets of community value requires clarification as it no longer sets out an objective test that a facility is no longer required. 5. Policy provides no objective test of what it means to support and promote an alternative use. 6. Policy lacks the requirement for at least equivalent quantity and location required by NPPF para 99. 7. Policy requires clarification on coverage of playing fields and outdoor sports facilities. 8. Policy fails to address the need for flexibility within the NHS estate. Policies aimed at preventing the loss or change of use of community facilities and assets, where healthcare is included within this definition, can have a harmful impact on the NHS’s ability to ensure the delivery of facilities and services. 9. Policy with regard to loss or replacement of existing community facilities needs to be considered in regard to site-specific circumstances and on a case-by-case basis. Proposals that result in a loss of a community facilities may deliver other substantive public benefits that outweigh the loss of the facility. 10. Policy should also recognise the potential for replacement community facilities to be incorporated into mixed use residential schemes where a genuine community need is being met. 11. Policy is not consistent with NPPF para 93 which requires planning policies to plan positively for the provision and use of community facilities. It also requires policies to ‘guard against’ the ‘unnecessary’ loss of valued facilities services, particularly where this would reduce the community’s ability to meet its day-to-day needs. 12. Policy wording is unclear in relation to where the loss community infrastructure is acceptable, in particular where community infrastructure which serves a specific community/requirement is re-provided outside the plan area. 13. Policy should be in accord with London Plan in terms of redevelopment or disposal of surplus NHS sites Redevelopment of

	<p>NHS sites and the introduction of housing and other uses provides vital investment to re-invest in new and improved health facilities which are fit for purpose. Council's strategy is justified</p> <ol style="list-style-type: none"> 14. Policy helps protect valued facilities in Barnet from unnecessary loss in line with the NPPF and London Plan, and facilitates new facilities in the Borough. 15. Policy ensures that community facilities are provided for Barnet's communities. 16. Policy enables the enhancement of community infrastructure whilst also providing sufficient flexibility to provide a replacement facility, of better quality, off site. 17. Policy allows for appropriate development to come forward in the right places to meet the needs of the Borough and demands of the market.
<p>Policy CHW02 : Promoting health & wellbeing</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy does not contain a clear reference to the importance of access to green/blue infrastructure and open space for health and wellbeing. 2. Plan needs to commit that applying the healthy streets approach will mean that Council will direct all possible funding towards healthy streets schemes across the borough and by adopting these policies in all planning decisions. 3. Plan describes a biodiversity metric which purports to assess an area's value to wildlife. This needs to include light pollution. This will help offer immediate and better protection of the bio-environment and health. 4. Policy should acknowledge the role of specialist older persons' housing in improving the health and wellbeing of the Borough's elderly residents. Council's strategy is justified 5. Policy seeks to allocate developer contribution towards the provision of health and social care facilities. 6. Plan has improving health and well-being as a theme throughout the whole document and this is highlighted by a specific policy. 7. Policy includes Active Design to help achieve the Council's health and wellbeing aspirations. 8. Policy references to the Healthy Streets Approach and sustainable and active travel is supported. 9. Council's aspirations to improve the health and wellbeing of its residents is commendable. 10. Policy provides a comprehensive policy framework to support health and wellbeing. 11. Policy supports the use of developer contributions for healthcare infrastructure. 12. Policy clarifies the role of Health Impact Assessments (HIAs) on larger developments.
<p>Policy CHW03 : Making Barnet a safer place</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy needs to require developers with whom the Council partners on schemes to show a proactive approach to fire safety, including a history of this in the past, or of correcting issues that have arisen. 2. Policy needs a specific reference to making Barnet a safer place for women and girls, taking that as a starting point to inform design and planning that will benefit everyone. 3. Policy needs a specific reference to a public health approach to crime, particularly youth crime, linked to policy CHW01 and to

	the Joint Health and Wellbeing Strategy.
Policy CHW04 : Protecting Public Houses	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy is silent on providing much needed housing where it is demonstrated that a public house is no longer in demand.
ECONOMY	
Policy ECY01 : A Vibrant Local Economy	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy should be revised to support industrial uses within Brent Cross Growth Area. 2. Policy should be revised to support mix use development providing housing where there is no net loss of employment floorspace and the residential use is compatible with surrounding uses. 3. Policy should be clarified with regard to Brent Cross Growth Area being considered an ‘allocated site’ as this might prevent certain employment uses such as last-mile logistics coming forward at Brent Cross 4. Policy is insufficiently visionary about job creation. Plan needs to be more proactive and imaginative, for example linking provision of new kinds of jobs and new kinds of homes. 5. Policy is overly rigid and does not allow for circumstances whereby an LSIS site can accommodate enhanced employment provision (either through quality improvements and/or increased floorspace) but also presents an opportunity to maximise other uses such as residential. 6. Policy is also inconsistent with London Plan which does not require co-location schemes to be ‘employment led’. 7. Policy designates Hurricane Trading Estate and the adjacent Travis Perkins site as a new Locally Significant Industrial Site (LSIS) despite emerging proposals to regenerate and intensify the site. Policy has significant potential to stifle the opportunity to intensify the planning benefits offered by redevelopment. 8. Policy designates Nos. 30-120 Colindeep Lane as an ‘Area of Business Location’. The Plan fails to consider if the site could reasonably be redeveloped to provide an intensified use as part of a residential led mixed use scheme or provide sufficient justification for the site’s designation as an ‘Area of Business Location’. 9. Policy should be modified to provide greater flexibility regarding the partial replacement of commercial floorspace in relation to mixed use redevelopment that accords with other relevant policies and planning priorities. 10. Plan contains very few measures to protect employment land from housing development and Policy ECY01 allows this to take place so long as a financial contribution is made. Given residential values will always exceed employment land values, the reduction in employment land will only continue unless strong policies are in place. 11. Policy fails to designate Tech Hubs or Research & Development sites which have the potential to bring skilled, well paid

	<p>employment to Barnet and as such will mean that job creation is limited to office and retail.</p> <p>12. Plan should take a more positive approach to job creation with a target for the number of jobs to be created linked to the number of new homes built so that additional new homes can only be built if a there is a corresponding number of jobs created. This would help to reinforce the link between housing and employment, something which will be essential for a sustainable society.</p> <p>13. Policy is unclear on assessing alternative uses on non-designated employment sites. It should clarify that the non-designated employment sites relate to those sites in office and industrial use only.</p> <p>14. Policy should be revised to remove the requirement for premises to be vacant for over 12 months as an owner would commence marketing ahead of vacancy. The primary consideration should be whether there is a reasonable prospect of the site being occupied for the relevant employment use.</p> <p>Council's strategy is justified</p> <p>15. Policy supports economic growth and productivity in line with para 82 of the NPPF, and also seeks to make the most effective use of suitable sites.</p> <p>16. Policy criteria applied to Friern Bridge Retail Park would support it as a suitable redevelopment site in the future for logistics and distribution.</p>
<p>Policy ECY02 : Affordable Workspace</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <p>1. Policy requirement has not been fully considered as part of the Local Plan Viability Assessment (May 2021). Affordable workspace is only tested as part of mixed use, residential schemes and there is no typology which reflects a commercial-only scheme.</p> <p>2. Plan includes a formula used to calculate off-site contributions. The rationale for the formula is unclear and has the potential to require significant financial contributions.</p> <p>3. Policy should clarify what area of Brent Cross i.e. Growth Areas or Opportunity Area it is referring to.</p> <p>4. Policy does not set out the level of discount to market rents that the Plan expects the 10% of gross floorspace to be let at by the developer.</p> <p>5. Policy is silent on the extent of fitting out obligations on the developer, which should be limited to Cat A fit out.</p> <p>6. Policy fails to provide sufficient detail to ensure flexibility and effective implementation.</p> <p>7. Policy fails to set out what constitutes a 'designated employment area', 'new employment space' and an 'Area of Business Location'.</p> <p>8. Policy uses 'gross new floorspace'. It would be more appropriate to calculate provision on NIA (Net Internal Area) rather than GIA (Gross Internal Area) as the NIA better reflects the actual useable and lettable area of employment generating floorspace.</p> <p>9. Policy should be modified to ensure that affordable workspace is only required where viable to address an identified local need.</p> <p>Council's strategy is justified</p> <p>10. Plan provides for affordable workspace obligations to be provided either on or off-site. This is welcomed as on-site affordable workspace can affect the feasibility of commercial development.</p>

<p>Policy ECY03 : Local Jobs, Skills & Training</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy requires compliance with the Council’s Delivering Skills, Employment, Enterprise and Training (SEET) from Development SPD (2014) or any subsequent SPDs. This is unreasonable because the SPD has not gone through the same challenge process as adopted policies. 2. Requirements of the SPD are massively onerous and monetary calculations are outrageously high with no proper justification. This document needs to be reviewed thoroughly as part of the new Local Plan requirements. 3. Policy fails to mention green skills.
<p>ENVIRONMENT & CLIMATE CHANGE</p>	
<p>Policy ECC01 : Mitigating Climate Change</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy is ineffective and contrary to the direction of national regulation. Matters relating to construction and performance of residential buildings is an area that is subject to great change as a feasible pathway to zero carbon homes is devised. Risk that local plan policies become out-of-date swiftly. 2. Plan describes a biodiversity metric which purports to assess an area’s value to wildlife. This biodiversity metric must include light pollution which has a well-documented impact on human and environmental health. 3. Policy should make clear that historic buildings may need different and non-standard interventions to reduce energy consumption and carbon emissions to avoid effects on significance. 4. Policy needs to be strengthened to show how the Local Plan helps meet the target of net zero carbon dioxide rather than simply ‘minimising’ the effect of development on climate change. Needs to be making existing homes energy efficient; ensuring that Barnet has electric buses; creating new green spaces and preserving current ones: speeding up the installation of solar panels: supporting a dense network of zero-carbon shared mobility by 2024. 5. Policy needs to reflect that sometimes site constraints such as the historic environment may entail it’s not possible to achieve emission targets on site. A flexible approach is required as to the most appropriate technologies in any particular circumstances or whether a carbon offset payment would be preferable. 6. Policy should not be prescriptive with regard to how net-zero may be achieved. 7. Policy of implementing significantly enhanced sustainability measures particularly when balanced against other local plan priorities and given the Government’s clear commitment and incremental progress towards achieving net zero is questionable. 8. Policy in it’s support of enhanced design and sustainability standards as required in the London Plan is not feasible as the evidence base supporting the London Plan is not credible. 9. Policy should make a specific reference to the need to avoid urban heat islands, and avoiding flash flooding, or overflow into rivers, by designing in, or retaining, green space. 10. Policy is supported in terms of concentrating growth in the identified Growth Areas, as infrastructure is able to be built here to ensure that climate impacts are reduced. 11. Policies supporting the Growth Areas do not specify any requirement around reducing carbon emissions and net zero development.

	<p>12. Policy requirements highlight lack of ambition within the Plan in tackling climate change and reducing carbon emissions. Many of these need strengthening in terms of reducing energy use and reducing carbon emissions.</p> <p>13. Council's strategy needs to be much more transparent to residents about use of carbon offset funds.</p> <p>14. Policy fails to stop the use of natural gas as a fuel source in new development. Building fossil fuelled energy into new development is an approach that locks in carbon emissions for the long term and guarantees that replacement/retrofit will be required in the future.</p> <p>Council's strategy is justified</p> <p>15. Supportive of the Council's position to minimise contributions to climate change.</p> <p>16. Policy is supported by NHS which is committed to reaching 'net zero' carbon by 2040 and an 80% reduction in emissions by 2028 to 2032.</p>
<p>Policy ECC02 : Environmental Considerations</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy is unreasonable in requiring an initial noise risk assessment for all minor development (including conversion and the provision of one dwelling). 2. Policy needs to be clearer on how the impacts of air pollutants can be mitigated. 3. Plan does not address the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. 4. No reference is currently made to the SRN or Highways England within this Local Plan policy. For sites positioned close to the SRN carriageway and junctions, it will be necessary to ensure that the proposals mitigate appropriately the potential for ground conditions, lighting, noise and vibration impacts. In terms of noise, we would expect the site masterplan to be designed to minimise the exposure of noise-sensitive receptors to strategic traffic, using either or a combination of a landscape buffer and acoustic bund designed to shield the settlement from motorway noise. 5. Also need to ensure that drainage, landscaping, lighting and boundary treatment proposals for the proposals in accordance with the DfT Circular 02/2013 Annex A A1, which states that all noise fences, screening and other structures must be erected on the developers land, and far enough within the developers land to enable maintenance to take place without encroachment onto highway land. 6. Impacts arising from any disruptions during construction, noise, vibration, traffic volume, composition or routing and transport infrastructure modification should be fully assessed and reported.
<p>Policy ECC02A : Water Management</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy requirement for a sequential test where any part of a site (including land not to be developed) falls outside a flood zone 1 area is unreasonable because it would restrict opportunities to build dwellings on areas inside flood zone 1, where amenity space may be within a flood zone. 2. Policy is reliant on West London Strategic Flood Risk Assessment which contradicts NPPF para 163 with regards to the sequential test. 3. Policy should clarify how proposals for minor and householder development incorporate SuDS 4. Policy should clarify appropriate contributions made to the Council where necessary

	<ol style="list-style-type: none"> 5. Plan should set out policies that protect and enhance existing greenspaces, such as front gardens and establish more green verges and tree planting along the kerbside. 6. Policy requirements for FRAs to be submitted for sites within the 1% AEP plus 70% for fluvial climate change could cause an issue for the EA particularly in terms of effectively defending this at planning appeals. EA are also concerned about the use of 70% climate change extents as this massively exceeds the requirements set out by the latest climate change allowance guidance. Requiring the Sequential Test to be provided should still be easily justified as if a site is at risk within the 70% climate change extent, there's still reason to apply the Sequential Test and demonstrate that there aren't alternative sites not at risk. 7. No reference is currently made to the SRN or Highways England within this Local Plan policy. No new connections are permitted to Highways England drainage network. In the case of an existing 'permitted' connection, this can only be retained if there is no land use change. Development must not lead to any surface water flooding on the SRN carriageway. These points apply to the site operation and construction phases. Highways England should be contacted to discuss these points in detail as part of, or in advance of a planning application submission Council's strategy is justified 8. Policy requirement to achieve a positive reduction in flood risk is justified but may need further guidance to set out what is expected to meet this standard. 9. Policy requirements welcomed on ensuring there is sufficient capacity for water supply and wastewater networks and that upgrades are carried out in time for development. 10. Policy requirements welcomed on naturalising the watercourse and ensuring an adequate buffer zone of at least 10 metres (greater if a tall building is being proposed) and enabling public accessibility. 11. Policy requirements welcomed on ensuring buildings are not sited over the top of new or existing culverts/ordinary watercourses. 12. Policy requirements for flood risk, surface water management, water infrastructure and watercourses are supported 13. Policy regarding sustainable draining for new developments, such as with verges and tree planting is supported.
<p>Policy ECC03 : Dealing with Waste</p>	<p>No Responses</p>
<p>Policy ECC04 : Barnet's Parks & Open Spaces</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy basis of "low value, low quality" is a subjective judgement. Open and green spaces can be improved to deliver important local amenity. The 'evidence' to justify this policy is out of date, extremely subjective in its judgements and should not be used. 2. Policy should seek to protect and enhance all open, green and play space with a presumption against development. 3. Policy does not give Council a clear policy mandate for seeking improvements to the quality and accessibility of areas such as the Welsh Harp reservoir through developer contributions. 4. Policy lacks commitment to make parks and open spaces accessible by cycle or for cycling within them. 5. Policy should support proposal by Friends of Market Place Playground for a new park to help address an area of open space

	<p>deficiency based on and around the current Market Place area.</p> <ol style="list-style-type: none"> 6. Policy should support proposals by the Friends of Cherry Tree Wood to extend the Wood to incorporate the end of Brompton Grove. 7. Supporting text should clarify provision of new local open space at Whalebones Park is subject to planning permission being granted and following an approved development being built out. 8. Council's position on improving access to open spaces, particularly in areas of public open space deficiency is supported and could be strengthened to emphasise working proactively with developers to provide development which enables the provision of new public open space. 9. There is no confidence from residents in the policy in its present form. No green space listed in the Barnet Parks and Open Spaces Strategy should be considered for redevelopment except in exceptional circumstances 10. Policy should not support development on Barnet's parks and open spaces in areas that are deficient in open space, unless alternative space of equivalent or better quantity and quality can be identified. 11. Policy is reliant on Barnet Parks and Open Spaces Strategy, an assessment that fails to take into account whether the park or open space is in an area deficient in public open space. The assessment has been a barrier to investment in those areas in recent years, and has therefore been part of a self-fulfilling cycle of deterioration. 12. Policy needs to provide stronger protection in areas which are deficient in open space, in line with Barnet's Joint Health and Wellbeing Strategy, and NCL ICP's focus on reducing the health inequalities of policy. 13. Policy does not make any reference to playing fields so it is not clear if playing fields would be addressed by this policy or another community policy or both. 14. Policy makes limited reference to protection of existing playing fields/open spaces, including its function. It should clarify that any enhancement and new provision of playing field should meet the needs and actions identified in the emerging Playing Pitch Strategy Refresh. 15. Policy should reflect NPPF, para 97, which does specifically seek to protect playing fields (not just pitches) unless certain exceptions are met. 16. Policy allows losses of playing fields when not viable but not being viable is not the same as strategically being identified as surplus. This should be amended as it is currently does not align with national policy." 17. Policy does not plan adequately for the impacts that this population and development increase will have on the open and natural environment. Although evidence to support stronger policy is clear it has not been fully and properly addressed. 18. Policy promotes a Regional Park but there is nothing specific on how and when it will be delivered. 19. Plan recognises the importance of open space to access and enjoy during the COVID-19 lockdown. As Barnet grows there is a need to improve provision and plan for the creation of at least one new district park and 13 new local parks by 2040. To make policy ECC04 sound and based on evidence para e) i) – iii) should be deleted along with relevant supporting text. 20. Policy and proposal 32 rely on the assessment of BPOSS which demonstrates the misguided notion of low value/low quality and the unsound judgements that have led and could lead to more open space being lost. 21. Policy reliance on BPOSS evidence. Scoring and weighting methodology was challenged during the prior public consultation.
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	<p>Council’s strategy is justified</p> <p>22. Policy sets out the Plan’s support for the provision of sports facilities.</p> <p>23. Policy supports the need to optimize the benefits that open spaces can deliver, ensuring that as well as being family friendly, they consider all users and create a greener Barnet.</p>
<p>Policy ECC05 : Green Belt & Metropolitan Open Land</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy references within the policy should be amended to NPPF paras 137 to 151. 2. Plan does not safeguard land to meet future development needs beyond the current plan period. This may require the review of the Green Belt in sustainable locations such as Bury Farm. <p>Council’s strategy is justified</p> <ol style="list-style-type: none"> 3. Policies aimed at protecting all of Barnet’s green spaces. Green Belt and MOL is strongly supported. 4. Policies and boundaries in the plan have recently been the subject of a review which clearly sets out that the existing designated land meets the relevant criteria for designation and thus should be supported.
<p>Policy ECC06 : Biodiversity</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy should refer to the benefits to Borough residents from the ecosystem services that being close to nature provides, and outline an expectation that offsite net gain must be sought as close to the development as possible. This can be supported by a suite of projects that development can contribute to, thereby ensuring the biodiversity within the Borough is protected and enhanced. 2. Policy can be strengthened by making provision for a net gain supplementary planning document (SPD). 3. Policy should be revised with Biodiversity Metric 3.0 to measure gains and losses to biodiversity resulting from development, and implement development plan policies on biodiversity net gain (BNG). 4. Plan should set out requirements to monitor biodiversity net gain, including specific indicators to demonstrate the amount and type of gain provided through development. 5. Plan fails to make reference to biodiversity within proposals in Hendon, including those that adjoin parks and open green spaces, such as site 40 - the Meritage Centre – Middlesex University and the Burroughs, which sits within a conservation area, and an archaeological priority area, and backs onto Sunny Gardens Park. 6. Plan fails to make any mention of protected species such as bats, birds, and slow worms, and fails to set out how it will mitigate the effects of development on the natural environment. 7. Plan should provide up to date biodiversity information of all sites included within the draft Local Plan. This would entail a comprehensive audit of biodiversity in the Borough. 8. Plan should include reference to a full Environmental Impact Assessment for each of the sites listed for development, especially where development has already been approved. 9. Policy wording is too general and vague. A solid reference to the 10% target would demonstrate the Borough’s commitment and endorsement of BNG and it helps prepares applicant’s early for the requirement.

	<p>10. Policy should make it clear that BNG would need to be demonstrated even where development proposals do not result in biodiversity loss, and the normal mitigation hierarchy would still apply where any biodiversity losses are proposed.</p> <p>11. Policy should highlight that the BNG should be delivered on-site, off-site or via statutory biodiversity credits and that the habitat would be secured for at least 30 years via s106 or conservation covenants.</p> <p>12. Plan fails to recognise B-lines, promoted by Buglife as part of the Governments National Pollinator Strategy One of the B lines in London crosses parts of the Borough including the New Southgate opportunity area. B-Lines are an imaginative solution to the problem of the loss of flowers and pollinators.</p>
<p>TRANSPORT & COMMUNICATIONS</p>	
<p>Policy TRC01 : Sustainable & Active Travel</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy should clearly state the aim to enable as well as promote. Promotion can only succeed where sustainable transport modes are truly accessible to all residents. 2. Policy support for “attractive and an accessible cycle links especially in development areas” and “good quality walking surfaces and off-road cycle routes” and the adoption of the Healthy Streets approach. However these should not be confined to development areas. These improvements will have a greater impact on modal shift if they are accompanied by further measures to make active travel safer, easier and cheaper than using the car. 3. Policy wording is not consistent with NPPF para 111 which recognises that some impacts may be acceptable and only where impacts are ‘unacceptable’ or ‘severe’ should that result in refusal on highway grounds. 4. Policy in terms of requirement for a Transport Assessment is not consistent with NPPF para 111 which states that only where highway impacts are ‘unacceptable’ or ‘severe’ should permission be withheld. As a result it is not necessarily appropriate for a Transport Assessment to mitigate ‘any negative impact’ and the wording should be amended accordingly. 5. Policy should support a planned, connected network of cycling routes, alongside a policy to allow ancillary cycling infrastructure (such as bike sheds and bicycle parking). 6. Policy in supporting active transport needs to include thought for pedestrians, including 20 mph speed limits, safe pavements, benches and (as already mentioned) public toilets. 7. Policy should support specific reference to equalities issues, in particular accessibility for women and girls, as well as older and disabled people, as structures that work for them (as primary users of public transport and active transport) will improve the borough for everyone. 8. Policy predominantly focuses on public transport infrastructure delivery and does not clearly set out measures that will be taken to promote walking and cycling within the Borough. This is considered a missed opportunity to promote two modes critical to achieving modal shift objectives and policy objectives relating to air quality and public health. 9. Policy fails to refer to Mayor’s Vision Zero agenda. 10. Policy fails to refer to Mayor’s Vision Zero agenda. 11. Policy stipulates that the Council will “promote orbital travel improvements where appropriate”; but fails to reference these improvements. <p>Council’s strategy is justified</p>

	<p>12. Policy supported as it promotes sustainable transportation.</p> <p>13. Policy aim to “deliver a more sustainable transport network ... by reducing car dependency, encouraging sustainable modes of transport and improving air quality” is supported.</p> <p>14. Council’s commitment to active travel improvements and implementing the Healthy Streets Approach as well as the requirement for assessments and plans to show how they are contributing to meeting mode split targets is welcomed.</p>
<p>Policy TRC02 : Transport Infrastructure</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy fails to mention shared mobility hubs or space for cycle infrastructure. 2. Policy should include specific provision to reflect the spatial needs of a move to active travel and shared and electric mobility; as well as a move to consolidated goods delivery. 3. Policy is vague on plans for infrastructure that will enable people to use buses, walking and cycling to reach new train and underground stations. 4. Policy fails to disguise the paucity of improvements to transport capacity. Of the eight measures listed, five are merely improvements at interchanges and the last is meaningless. Only indications of improvements to capacity are the West London Orbital, which will only serve one corner of the Borough, and Crossrail 2 which is most unlikely to be delivered over the lifetime of this Plan. 5. Policy support for upgrades to Hendon Station as this will help facilitate growth. 6. Policy is focused primarily on public transport delivery and does not clearly set out measures that will be taken to promote walking and cycling within the Borough. A list of key projects to enhance walking and cycling should be included. 7. Policy should be revised to reflect that a new underground station ticket hall building and enhanced public transport interchange at Colindale. 8. Policy should confirm that where appropriate, development proposals will be expected to facilitate and contribute to the delivery of this infrastructure. 9. Policy commitment to identifying and protecting land for enhancing rail capacity could be expanded to refer to public transport capacity so that it included bus garages and standing facilities. 10. Government policy is set out in para 18 of DfT Circular 02/2013 which states that ‘capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage’. 11. Proposals that identify necessary SRN improvements should have been tested as part of the long-term Transport Strategy. It should identify the provision of infrastructure at the right time to support the development strategy, combined with developer contributions to secure infrastructure provision as part of the IDP. Proposals will be expected to proceed in line with the necessary highway improvements identified in the IDP. Highways England would make use of Grampian conditions to ensure that necessary infrastructure is in place prior too or phased in relation to the development becoming operational. <p>Council’s strategy is justified</p>

	<p>12. Plan recognises need to invest in public transport lines and interchanges and we support investment in orbital and radial public transport.</p>
<p>Policy TRC03 : Parking Management</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Policy should clarify the process for new CPZs and explain who decides whether a CPZ is required. The introduction of a CPZ does not fall within the control of a developer and this objective has to be driven and promoted by the Council. 2. Policy requirement that residential parking permits will only be available to Blue Badge holders in car free developments and Disabled Persons parking should be provided in accordance with London Plan Policies T6.1 and T6.5 is wholly unreasonable and not justified. 3. Policy does not comply with London Plan Policy T6 (Car parking) which seeks to restrict car parking “in line with levels of existing and future public transport accessibility and connectivity.” Many parts of Barnet which have CPZ’s but don’t have a high PTAL rating. 4. Policy at best should only be applicable to PTAL 5-6 areas as many parts of the borough have poor public transport options. Developments in areas which do not have a very good PTAL rating could become unviable. 5. Policy would deter families from buying or renting family sized dwellings in areas which are not highly accessible. 6. Policy does not deter off street car provision for developments but seeks to punish developments that provide car free development in areas where there is sufficient on street car parking provision. 7. Policy requirement for proposals that involve a reduction of existing off-street car-parking spaces, the developer must demonstrate that sufficient parking will remain in the area to serve local needs is massively onerous for small developments. 8. Policy requirement that spaces should be available for car club vehicle parking along with car club membership for future residents of the development within the agreed car parking provision should not be applicable for minor schemes. 9. Policy does not state that the Council will show flexibility in the assessment of parking requirements 10. Policy requirements to apply within an existing CPZ are not set out in the Policy. 11. Policy "flexibility" will allow Borough's streets to be used as overflow parking for developments with no or inadequate on-site parking. In relation to para d), the wording is unsound as it only applies where proposals involve a reduction of existing off-street car parking spaces 12. Policy needs to clarify the term "local needs" 13. Policy should clarify how use of use of energy from electrical vehicle car-parking points will be paid and apportioned. 14. Policy parking standards are too high: one third of Barnet households currently do not own a car and the council should be looking to reduce this further in line with transport strategy. There should be a presumption in favour of zero car or ‘car lite’ (0.3 spaces for household) development 15. Policy should set out a presumption in favour of public transport, walking and cycling. 16. Policy fails to reference use of front gardens for car parking as well as opposing any new Domestic Footway Crossovers. This

	<p>is particularly important to support introduction of Controlled Parking Zones.</p> <ol style="list-style-type: none"> 17. Policy should promote car share as an alternative to car ownership. It is essential to define policies which will promote car share as a means to reducing private car ownership in line with the London Plan. 18. Policy focuses on what's allowed in new developments but needs to extend borough wide. It needs to support policies ECC01, TRC01 and TRC02 to discourage private car use and favour active travel. 19. Policy should provide a flexible approach with regards to the site specific circumstances, as well as Table 23 and the London Plan. 20. London Plan does not offer parking standards for all land uses. Council must offer guidance on the parking standard for all uses or determine how standards should be assessed as part of Transport Assessments. London Plan maximum standards for retail uses do not consider that customer car parking is essential for the viability of large format food retail uses where customers are collecting large and bulky items. 21. Policy should make clear that London Plan Policy T6.3 Part G does allow for flexibility in applying the retail car parking standards when they could adversely affect a town centre's vitality and viability. 22. Policy flexibility also required for office uses. Whilst the maximum standard at BX Town is more generous than is prescribed by the London Plan there is a need to provide adequate office parking to ensure the vitality and viability of town centres. 23. Policy should provide a more flexible approach to cycle parking whereby lower levels could be provided initially with more spaces provided in accordance with demand as monitored through the Travel Plans. 24. Policy states that the Council will expect residential development to provide parking in accordance with Table 23. Plan needs to make it clear, that the parking standards in Table 23 are maximum standards 25. Policy fails to provide details on the 'appropriate levels of car club and visitor parking' are set out in the Draft Local Plan or Draft Policy TRC03. 26. Policy should explicitly reference that the residential vehicle parking standards set out in Table 23 are maximum standards and that a lower maximum standard will be applied in relation to site located within Opportunity Areas. 27. Policy reliance on using the PTAL rating to establish maximum parking standards is not always suitable. It needs further criteria such as the type, mix and use of development. 28. Policy should acknowledge (as per the London Plan) that development within and in close proximity to town centres "generally have good access to a range of services within walking distance, and so car-free lifestyles are a realistic option for many people living there <p>Council's strategy is justified</p> <ol style="list-style-type: none"> 29. Policy is supported in seeking car parking for non-residential uses, electric vehicle charging points and cycle parking for all uses in accordance with the London Plan standards. 30. Policy is supported with regard to maximum car parking standards being applied to each site with sensitivity to local circumstances, including parking stress, ownership of surrounding areas, and location and proximity to local services 31. Policy is supported with regard to reducing car parking provision through the delivery of car club parking bays and pool cars 32. Policy is supported with regard to confirmation that up to 0.5 spaces per dwelling is to be allowed for developments within
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	<p>Opportunity Areas but consider this should be extended to the other locations identified for housing growth under GSS01 including Major Throughfares.</p> <p>33. Policy revision on CPZs is welcomed as it enables flexibility in the application of the policy so as not to hinder development</p> <p>34. Local Plan Table 23 which is now broadly in line with Table 10.3 in the London Plan 2021. Differences are consistent with the London Plan which states that ‘Where development plans specify lower local maximum standards for general or operational parking, these should be followed.’</p> <p>35. Local Plan footnote added on Table 23 requiring residential development in metropolitan and major town centres to be car-free, and for development in outer London Opportunity Areas to have no more than 0.5 spaces per dwelling on average. The residential parking standards are now in conformity with the London Plan.</p> <p>36. Policy requirement that ‘Cycle parking is to be delivered in accordance with London Plan Standards is welcomed.</p> <p>37. Policy requirement for car club parking and membership is welcomed.</p>
<p>Policy TRC04 : Digital Communication & Connectivity</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <p>1. Policy needs to recognise the value of enabling working from home to reduce the overall need to commute, not only to travel outside peak periods.</p>
<p>DELIVERING THE LOCAL PLAN</p>	
<p>No Responses</p>	
<p>SCHEDULE OF SITE PROPOSALS</p>	
<p>Sites - General</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <p>1. Risk that proposals will come forward that would conflict with policies elsewhere in the plan designed to conserve the historic environment.</p> <p>2. Further detail needed to provide greater clarity and certainty over what would be allowed on each site.</p> <p>3. Council has applied the density matrix from the 2016 London Plan to assess the indicative residential capacity of sites. London Plan no longer contains this matrix and instead adopts a design led approach with intention to optimise housing delivery, therefore approach to site allocation numbers and capacity should be updated to reflect this.</p> <p>4. Green Belt is a spatial policy which should not be used to deem sites unsuitable on this basis alone. This decision should be made in the context of deciding whether exceptional circumstances exist (which has not properly taken place within the established parameters of the Calverton judgement).</p> <p>5. Within the NHS property portfolio, a number of sites are, or may become outdated and no longer suitable for modern healthcare without significant investment. a more flexible approach for public service providers should be applied when considering a change of use to non-community uses. In addition, arbitrary floorspace figures should be avoided as these figures can severely limit the quantity and quality of future healthcare facilities provided and are detrimental to the provision of</p>

	NHS services within the Borough.
Site 1 Former Church Farm Leisure Centre	Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy Given the number of designated heritage assets either adjacent to or in close proximity to the site, there should be greater detail as to how effects of any development will be managed. This should include any potential effects on setting and a requirement for archaeological assessment.
Site 2 North London Business Park	Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy <ol style="list-style-type: none"> 1. The wastewater network capacity may be unable to support the demand anticipated from this development; local upgrades to the existing drainage infrastructure may be required and detailed drainage strategy submitted with the planning application 2. Development should include green spaces and pocket parks with walking and cycling routes to provide access for residents and attractive linkages between Brunswick Park Road, Ashbourne Ave, Howard Close and Oakleigh Road. <p>Support</p> <ol style="list-style-type: none"> 3. Support that the allocation of the NLBP site has been updated since the Regulation 18.
Site 3 Osidge Lane Community Halls	Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy <ol style="list-style-type: none"> 1. Overdevelopment and therefore site should be withdrawn. 2. Use the opportunity to improve walking and cycling access to the primary school and to Brunswick Park open space. <p>Advisory</p> <ol style="list-style-type: none"> 3. Liaison recommended with Thames Water to advise on development phasing.
Site 4 Osidge Library and Health Centre	Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy <ol style="list-style-type: none"> 1. Site makes reference to parking ‘requirements’ or ‘needs’, associated parking or replacement parking spaces. Re-provision of parking and any parking associated with new uses should be minimised, based on demand management rather than predict and provide. 2. Overdevelopment, site should be withdrawn.

<p>Site 5 Edgware Hospital</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Site makes reference to parking ‘requirements’ or ‘needs’, associated parking or replacement parking spaces. Re-provision of parking and any parking associated with new uses should be minimised, based on demand management rather than predict and provide. 2. Requirement for 75% of site to continue in hospital use is not based on any evidence. The site owner NHS PS itself cannot say precisely how much floorspace will be needed in future as commissioning and service location decisions are made by CCGs and will in future be decided by Integrated Care Boards. NHS PS is certain that all of the current floorspace is not needed, not least because there is a significant amount of unused or inefficiently-used floorspace on the site. Evolving models of care are likely to affect the amount of floorspace that is needed across the whole healthcare estate. NHS PS’s aspiration is to consolidate existing services into the under-occupied main hospital. Proposal not consistent with NPPF para 117. 3. Indicative capacity of site should be 450 to 500 dwellings. 4. Inclusion of site is unsound until we see evidence that the Sequential Test has been applied. Significant risks as the confluence of two rivers (Deans Brook and Silk Stream) converge at the northern part of the site. Any proposal would need to control the fluvial flood risk from two rivers with no current defenses, in addition to the other sources of flood risk. 5. Proposal indicates that the residential element will be located in the area of highest risk (flood zone 2 and 3). There are likely to be some potential challenges in achieving a sustainable balance between the set back from Silk Stream and Flood Zone 3b, sequential approach on-site, flood risk mitigation and the number of housing units required. 6. Proposals should take the opportunity to ensure effective connectivity to the Strategic Walking Network and improve the environment of this footpath and open up its access to the Silk Stream. 7. Development proposals should take the opportunity to ensure effective connectivity on foot and improve the environment of this footpath and open up its access to the Silk Stream.
<p>Site 6 Watling Avenue car park and market</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Site makes reference to parking ‘requirements’ or ‘needs’, associated parking or replacement parking spaces. Re-provision of parking and any parking associated with new uses should be minimised, based on demand management rather than predict and provide. 2. Proposal needs to consider impact on neighbouring streets from car parking and increased footfall. 3. Council needs to clarify its responsibilities as LLFA (Local Lead Flood Authority) 4. Proposal needs to consider impact on social infrastructure 5. Proposal raises major concerns about flood risk. About 38% of site lies within functional floodplain (Flood Zone 3b) and the vast majority of the remainder of the site lies within the 1 in 100 year (Flood Zone 3a) fluvial flood extent with 95% of the site covered during the 1 in 100 year plus climate change event. There is very limited scope to apply the sequential approach, provide floodplain compensation or ensure a safe means of access and egress. 6. Allocating site for residential is contrary to the aims of para 155 of the NPPF and Table 3: Flood risk vulnerability and flood zone ‘compatibility’ of the Planning Practice Guidance. The only permissible use classes in this zone are ‘water compatible’ or essential infrastructure (the latter if it passes the Sequential and Exceptions Test).

	<ol style="list-style-type: none"> 7. Sequential Test would need to be applied for More Vulnerable and Less Vulnerable uses in Flood Zone 3a, and as previously stated we see no evidence to justify the choice of this site in this regard. 8. Require appropriate evidence of how the Sequential Test has been applied to the site selection process, our view is that the choice of this site is not sound as it is not justified i.e. an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. Our strong recommendation is that the site is withdrawn. 9. Proposals should take the opportunity to ensure effective connectivity to the Strategic Walking Network and improve the environment of this footpath and open up its access to the Silk Stream. 10. Development proposals should take the opportunity to ensure effective connectivity on foot and improve the environment of this footpath and open up its access to the Silk Stream <p>Support</p> <ol style="list-style-type: none"> 11. Potential requirement for planning contributions towards station improvements, including step free access, is supported. 12. TfL support reference to improving interchange and contributing towards achieving station step free access. <p>Advisory</p> <ol style="list-style-type: none"> 13. Liaison recommended with Thames Water to advise on development phasing.
<p>Site 7 Beacon Bingo</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Council did not involve the community on this aspect of the plan or present this aspect as part of the Engage Barnet process. 2. Intensive development of this site will have a major effect on the entire town centre and Cricklewood as a whole. 3. The indicative capacity of the sites should be reduced to mid-range for the urban setting. Necessary adjustments should be made to any other parts of the plan dependent on these values or which led to the use of the current excessive values. <p>Advisory</p> <ol style="list-style-type: none"> 4. Liaison recommended with Thames Water to advise on development phasing. The wastewater network capacity may be unable to support the demand anticipated from this development; local upgrades to the existing drainage infrastructure may be required and detailed drainage strategy submitted with the planning application. <p>Non-compliance with Duty to Cooperate</p> <ol style="list-style-type: none"> 5. Council has not co-operated with neighbouring boroughs to form any sort of masterplan for Cricklewood, in the town centre of which this site is, despite half Cricklewood and its town centre falling in neighbouring Brent and around a quarter in Camden.

<p>Site 8 Broadway Retail Park</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Council did not involve the community or present as part of the Engage Barnet process. Only effective consultation being on a planning application to build 1050 residential units on the Broadway Retail Park site (the plan for 1007) to which there have been over 2000 objections. 2. High density is inappropriate for the setting and should be undeliverable as per the borough’s own general and particular policies including those summarized and reviewed in the Tall Buildings Update 2019. 3. Indicative capacity of the sites should be reduced to mid-range for the urban setting and necessary adjustments made to any other parts of the plan dependent on these values or which led to the use of the current excessive values. 4. Proposal should include a requirement to take into account the relevant conservation area appraisals and any key views in the development guidelines (as has been included with Site 11). 5. The wastewater network capacity may be unable to support the demand anticipated from this development; local upgrades to the existing drainage infrastructure may be required and detailed drainage strategy submitted with the planning application. <p>Advisory</p> <ol style="list-style-type: none"> 6. Liaison recommended with Thames Water to advise on development phasing <p>Non-compliance with Duty to Cooperate</p> <ol style="list-style-type: none"> 7. Council has not co-operated with neighbouring boroughs to form any sort of masterplan for Cricklewood, in the town centre of which this site is, despite half Cricklewood and its town centre falling in neighbouring Brent and around a quarter in Camden.
<p>Site 9 Colindeep Lane</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Level 2 SFRA assessed site and recommended mitigation. It also highlighted sites vulnerability to flooding. Not a sensible site to propose housing given its vulnerable position, a thin strip of land less than a hectare between a railway embankment and floodplain of the Silk Stream main river. Given difficulty with access, and the implications of climate change both now and in the longer-term. Site is effectively surrounded by the functional floodplain to the south. It is likely that the sites vulnerability over time is going to increase not decrease. 2. Proposal (even though informed by Level 2 SFRA) is unsound as it’s not justified i.e. an appropriate strategy taking into account reasonable alternatives (lack of Sequential Test evidence, a review of alternatives) and its position and location makes it very vulnerable to flood risk and climate change. Strong recommendation is that the site is withdrawn. 3. Proposal is unsound because it will disrupt the existing woodland, new cycle and pedestrian route would not significantly reduce journey times. 4. Proposal involves loss of native grown trees. Conflicts with Plan’s ambitions on biodiversity net gain. 5. Ironic that this site is owned by TFL, which is headed by Mayor of London who has been pushing for congestion charges and ULEZ to help stop climate change. 6. Proposals should take the opportunity to ensure effective connectivity to the Strategic Walking Network and improve the

	<p>environment of this footpath and open up its access to the Silk Stream.</p> <ol style="list-style-type: none"> 7. Development proposals should take the opportunity to ensure effective connectivity on foot and improve the environment of this footpath and open up its access to the Silk Stream 8. The wastewater network capacity may be unable to support the demand anticipated from this development; local upgrades to the existing drainage infrastructure may be required and detailed drainage strategy submitted with the planning application. <p>Advisory</p> <ol style="list-style-type: none"> 9. Liaison recommended with Thames Water to advise on development phasing
<p>Site 10 Douglas Bader Park Estate</p>	<p>Advisory</p> <ol style="list-style-type: none"> 1. The wastewater network capacity may be unable to support the demand anticipated from this development; local upgrades to the existing drainage infrastructure may be required and detailed drainage strategy submitted with the planning application. <p>Support</p> <ol style="list-style-type: none"> 2. We welcome the requirement for public transport access improvements
<p>Site 11 KFC / Burger King Restaurant</p>	<p>Scale of development/s is likely to require upgrades to the wastewater network. Liaison recommended with Thames Water to agree a housing and infrastructure phasing plan to determine spare capacity currently available and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s.</p>
<p>Site 12 McDonald's Restaurant</p>	<p>Advisory</p> <p>Scale of development/s is likely to require upgrades to the wastewater network. Liaison recommended with Thames Water to agree a housing and infrastructure phasing plan to determine spare capacity currently available and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s.</p>
<p>Site 13 Public Health England</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Site lies on the Strategic Walking network and proposals should ensure effective connectivity to this network and open up its access to the Silk Stream with a walking and cycling route. 2. Proposals should ensure effective connectivity on foot and open up its access to the Silk Stream with a walking and cycling route. <p>Advisory</p> <ol style="list-style-type: none"> 3. Scale of development/s is likely to require upgrades to the wastewater network. Liaison recommended with Thames Water to agree a housing and infrastructure phasing plan to determine spare capacity currently available and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s.

<p>Site 14 Sainsburys – The Hyde</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Environment Agency consider inclusion of the site unsound pending sight of evidence that the Sequential Test has been applied. 2. Proposed development is within 20m of a Thames Water Sewage Pumping Station; any occupied premises should be located at least 20m away from the pumping station. 3. Site lies on the Strategic Walking network and proposals should ensure effective connectivity to this network and open up its access to the Silk Stream with a walking and cycling route. 4. Proposals should ensure effective connectivity on foot and open up its access to the Silk Stream with a walking and cycling route. <p>Support</p> <ol style="list-style-type: none"> 5. Canal & River Trust support the requirement for the site development to avoid harm to the adjacent Site of Borough Importance for Nature Conservation, and the inclusion of improvements to the Silk Stream River Corridor. <p>Advisory</p> <ol style="list-style-type: none"> 6. Scale of development/s is likely to require upgrades to the wastewater network. Liaison recommended with Thames Water to agree a housing and infrastructure phasing plan to determine spare capacity currently available and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s.
<p>Site 15 Tesco Coppetts Centre</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Site makes reference to parking ‘requirements’ or ‘needs’, associated parking or replacement parking spaces. Re-provision of parking and any parking associated with new uses should be minimised, based on demand management rather than predict and provide. 2. Site lies on the Strategic Walking network and proposals should ensure effective connectivity to this network and open up its access to the Silk Stream with a walking and cycling route. <p>Advisory</p> <ol style="list-style-type: none"> 3. Liaison recommended with Thames Water to advise on development phasing.
<p>Site 16 45 – 69 East Barnet Road</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Overdevelopment, site should be withdrawn. <p>Advisory</p> <ol style="list-style-type: none"> 2. Liaison recommended with Thames Water to advise on development phasing. •
<p>Site 17</p>	<p>This site was removed from the Schedule of Proposals</p>

<p>Site 18 Former East Barnet Library</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Overdevelopment, site should be withdrawn. <p>Advisory</p> <ol style="list-style-type: none"> 2. Liaison recommended with Thames Water to advise on development phasing.
<p>Site 19 East Barnet Shooting Club</p>	<p>Advisory</p> <p>Liaison recommended with Thames Water to advise on development phasing.</p>
<p>Site 20 Fayer’s Building Yard and Church</p>	<p>Advisory</p> <p>Liaison recommended with Thames Water to advise on development phasing.</p>
<p>Site 21 New Barnet gasholder</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Support for the principle of residential uses but further site analysis in line with the Mayor’s design led approach for sites to be optimised, site could deliver at least 250 homes as opposed to the 201 homes currently shown. Allocation should replace the word ‘indicative’ with ‘minimum of’. 2. Inclusion of ‘10% community uses’ is too onerous and not based on sound evidence; to enable flexibility allocation should state that a small element of non-residential uses ‘could be considered.’ 3. Development should incorporate key footpath linkages. <p>Advisory</p> <ol style="list-style-type: none"> 4. Liaison recommended with Thames Water to advise on development phasing
<p>Site 22 Sainsburys – New Barnet</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Site makes reference to parking ‘requirements’ or ‘needs’, associated parking or replacement parking spaces. Re-provision of parking and any parking associated with new uses should be minimised, based on demand management rather than predict and provide. 2. Unacceptable to build 199 flats on the Sainsbury’s site, site proposal should be withdrawn. <p>Advisory</p> <ol style="list-style-type: none"> 3. Liaison recommended with Thames Water to advise on development phasing.
<p>Site 23 Bobath Centre</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Site makes reference to parking ‘requirements’ or ‘needs’, associated parking or replacement parking spaces. Re-provision of parking and any parking associated with new uses should be minimised, based on demand management rather than predict and provide. 2. Important to be clear about the significance of any heritage assets present – both listed buildings on the site should be identified rather than one as at present.

	<p>Advisory</p> <p>3. Liaison recommended with Thames Water to advise on development phasing.</p>
<p>Site 24 East Finchley station car park</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Site makes reference to parking 'requirements' or 'needs', associated parking or replacement parking spaces. Re-provision of parking and any parking associated with new uses should be minimised, based on demand management rather than predict and provide. 2. Any commercial uses should expressly exclude retail/convenience retail. 3. Proposal lacks assessment of the heritage significance of the station or whether this significance will be affected by any development. 4. Community garden adjacent to the Grade II listed building in Site 24 should be recognised in site description. 5. Site lies on the Strategic Walking network and proposals should ensure effective connectivity to this network. 6. Use of percentages constrain the optimisation and delivery of new housing and development). 7. Proposal infers that development of this site would enhance car parking on the site. That would not be TfL's intention and must be amended. <p>Support</p> <p>8. Strongly support redevelopment of the car park for housing, including affordable housing.</p> <p>Advisory</p> <p>9. Liaison recommended with Thames Water to advise on development phasing.</p>
<p>Site 25 East Finchley substation</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Use should be overwhelmingly for housing and question the viability/demand for any offices reference for which should be removed. 2. Site capacity should be determined by the mix of homes (including affordable homes) and appropriate scale balancing the location close to the station, and proximity to the conservation area. <p>Support</p> <p>3. Strongly support the redevelopment of this redundant site for housing.</p> <p>Advisory</p> <p>4. Liaison recommended with Thames Water to advise on development phasing</p>

<p>Site 26 Park House</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Proposal should add extension to Cherry Tree Wood as opportunity to create new open space adjacent to Cherry Tree Wood which is remnant ancient woodland, designated MOL and a site of local significance for nature conservation. <p>Advisory</p> <ol style="list-style-type: none"> 2. Liaison recommended with Thames Water to advise on development phasing.
<p>Site 27 Edgware Town Centre</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Site makes reference to parking ‘requirements’ or ‘needs’, associated parking or replacement parking spaces. Re-provision of parking and any parking associated with new uses should be minimised, based on demand management rather than predict and provide. 2. Proposal should highlight this location is suitable for very tall buildings. 3. Present indicative site capacities as minimums to ensure the site allocation policies are sufficiently flexible and effective in their delivery. 4. Requirement to deliver in excess of 4,500 units on sites 27 and 28 imposing also a requirement of 25% non-residential uses on this site may constrain development and the delivery of new housing. 5. Site lies on the Strategic Walking network and proposals ensure effective connectivity to this network. <p>Support</p> <ol style="list-style-type: none"> 6. Intensification of housing and town centre uses on site supported. <p>Advisory</p> <ol style="list-style-type: none"> 7. Likely to require upgrades to the wastewater network; need for early liaison with Thames Water to agree a housing and infrastructure phasing plan.
<p>Site 28 Edgware Underground & Bus Stations</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Present indicative site capacities as minimums to ensure the site allocation policies are sufficiently flexible and effective in their delivery. 2. Requirement to deliver in excess of 4,500 units on sites 27 and 28 imposing also a requirement of 30% non-residential uses on this site may constrain development and the delivery of new housing. 3. Site lies on the Strategic Walking network and proposals ensure effective connectivity to this network. Proposals should ensure effective connectivity on foot and open up access to the Silk Stream with a walking and cycling route. <p>Support</p> <ol style="list-style-type: none"> 4. Requirement for bus operations and the function of the bus station to be protected or re-provided and that London Underground infrastructure and operations must also be maintained. <p>Advisory</p> <ol style="list-style-type: none"> 5. Likely to require upgrades to the wastewater network; need for early liaison with Thames Water to agree a housing and infrastructure phasing plan.

<p>Site 29 Scratchwood Quarry</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy Need to add a requirement for screen planting alongside the motorway to limit views into the waste management site.</p>
<p>Site 30 Finchley Central Station</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Site makes reference to parking ‘requirements’ or ‘needs’, associated parking or replacement parking spaces. Re-provision of parking and any parking associated with new uses should be minimised, based on demand management rather than predict and provide. 2. Proposal for 556 residential units, including 20 storey buildings, built on a small footprint, adjoining the Northern Line in a long-standing low-rise residential area, will have a devastating impact on the local environment and the preservation of the unique character of the area. 3. Proposal in an already congested neighbourhood will neither enhance the quality of life for residents, nor address the existing needs of infrastructure, affordable housing or local independent businesses. 4. Development is ill conceived, far too large for Finchley Central. 5. Building houses would far better meet the needs and the character of this neighbourhood. 6. Building four tower blocks of 20 storeys each ignores the fact that there are no buildings even close to that height in the surrounding area. 7. Area around the station is already crowded with residents creating volumes of litter in the adjacent streets and is not pleasant walking the streets at night. The addition of vast numbers of new properties can only exacerbate these problems. 8. Need for parking available for commuters; surrounding streets are all restricted parking zones. 9. Aware of encouraging cycling, but bicycles are no answer for the elderly or for children. 10. Not explained why the proposal at Finchley Central far exceeds the number of units at all other sites in Finchley and Golders Green. 11. Development will lead to huge disruption for the area for a considerable time. 12. Will result in loss of light, increase in population density and no supporting infrastructure exacerbating already great shortage of GPs and school places in the area. 13. Great many people trying to join the train at Finchley Central will become impossible at rush hour as already overcrowded on normal mornings and evenings. 14. Appear to be vacant buildings that could be utilised rather than constructing totally unsuitable buildings in a residential area with practically no high buildings. 15. Concern about resources to prevent adolescents engaging in anti-social behaviour. 16. Key plan objective is “to respond and recover from the impact of COVID19”. How building high density residential units with no outside space on a very compact site would achieve this is unclear. 17. A clearer analysis of the supporting services is required (from utilities to schools and healthcare) and a more specific

	<p>description of the retail and business units to be created to benefit the development and wellbeing of the area.</p> <p>18. Proposed tower is grotesquely out of all proportion and scale to any surround buildings and, from the designs released, has no redeeming architectural merit whatsoever.</p> <p>19. Safety concern by putting so many people in a restricted space as demonstrated by Grenfell Tower.</p> <p>20. Proposal will result in complete paralysis of traffic in the area.</p> <p>21. Proposals to create a community square is unnecessary as two large parks nearby.</p> <p>22. There will be a loss of light and sun when these hideous giant towers are erected.</p> <p>23. Includes a “micro park” which is so small to be laughable.</p> <p>24. Height of the building and excessive number of units makes this proposal completely unacceptable and the site should be withdrawn.</p> <p>25. Site lies near to the Strategic Walking network and proposals should ensure effective connectivity to this network.</p> <p>26. Allocation should include sufficient flexibility to enable provision of both tall and very tall building/s.</p> <p>27. With regards reference to: 50% residential uses with 50% retained transport infrastructure, commercial uses and car parking TfL requests the reference to percentages to be removed but if retained, clarified that this refers to site area (not the floorspace provided within new buildings) and that it is an approximate figure only.</p> <p>Advisory</p> <p>28. Wastewater network capacity may be unable to support the demand anticipated and so local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity ahead of the development. Need to liaise with Thames Water to determine whether a detailed drainage strategy submitted with the planning application is required, where, when and how it will be delivered is required.</p> <p>Support</p> <p>29. Welcome requirement that the development should reflect the Healthy Streets Approach with improved interchange facilities for pedestrians and cyclists.</p>
<p>Site 31 Brentmead Place</p>	<p>Advisory</p> <p>Liaison recommended with Thames Water to advise on development phasing.</p>
<p>Site 32 Manor Park Road car park</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Site makes reference to parking ‘requirements’ or ‘needs’, associated parking or replacement parking spaces. Re-provision of parking and any parking associated with new uses should be minimised, based on demand management rather than predict and provide. 2. Proposal should clearly state the right ward – East Finchley 3. Proposal is inconsistent with Council’s parking policies <p>Advisory</p>

	<p>4. Liaison recommended with Thames Water to advise on development phasing.</p>
<p>Site 33 Bunns Lane car park</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Site makes reference to parking ‘requirements’ or ‘needs’, associated parking or replacement parking spaces. Re-provision of parking and any parking associated with new uses should be minimised, based on demand management rather than predict and provide. 2. Concern about increased air pollution caused by traffic congestion as the proposal will invariably lead to more cars, more traffic, more congestion, and poorer air-quality. <p>Advisory</p> <ol style="list-style-type: none"> 3. The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan.
<p>Sites 34 to 42</p> <p>Site 34 Burroughs Gardens car park</p> <p>Site 35 Egerton Gardens car park</p> <p>Site 36 Fenella</p> <p>Site 38 Ravensfield House</p> <p>Site 39 The Burroughs car park</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Sites make references to parking ‘requirements’ or ‘needs’, associated parking or replacement parking spaces. Re-provision of parking and any parking associated with new uses should be minimised, based on demand management rather than predict and provide. 2. Loss of parking for residents would make homes on The Burroughs unliveable. Proposals lack up-to-date parking surveys 3. Proposals are an improper attempt to create a University campus in Hendon - an historic residential suburb. 4. Benefits for residents are undefined. Proposals are focused on students and highly prejudicial to environment and the interests of local residents 5. Proposals 34 to 42 involve demolition and rebuilding to 7 storeys tall creating an unnecessary environmental impact 6. Delivery of “lifetime neighbourhoods” help preserve quality of life. Size and scale of developments will not only destroy the character of The Burroughs and Church End, but also put Heritage at risk. 7. Plans do not follow advice given by Historic England and could cause significant harm to heritage and conservation areas 8. Proposal for Middlesex University’s own car park has been removed. 9. Consider loss of parking for people attending local places of worship is discriminatory. 10. New homes on the car parks will block out light and cause safety and security issues for local residents. 11. Housing on Burroughs Gardens car park (site 34) would negatively affect local businesses to rear and side of the car park. Middlesex University can develop its campus within its own footprint. 12. Demographic change caused by increased student residents in new build as well as private HMO’s. This would replace established residential neighbourhoods with transient ones. 13. Concerns about an increase in crime - due to student drug use - and in littering. 14. If Middlesex University is allowed to dominate the area, Hendon residents will be excluded from every single civic building on The Burroughs, and more than 17 privately owned buildings will be compulsorily purchased, with tenants forcibly moved out their homes.

<p>Site 40 Meritage Centre</p> <p>Site 41 PDSA and Fuller Street car park</p> <p>Site 42 Usher Hall</p>	<p>15. Concerns about additional pressure on infrastructure</p> <p>16. Existing Middlesex University campus could be redeveloped with low story buildings replaced with high story buildings, with student housing on top, and there is still open space on campus that is currently not used.</p> <p>17. Students could commute from land by Brent Cross.</p> <p>18. Provision suggested in the Local Plan has the singular aim of creating a University campus in a suburban, residential setting. The nature of London Universities is that they are largely commuter based with spread out campuses. There are no examples of campus universities in London.</p> <p>19. Public transport is inadequate and concerns about how it will change post pandemic</p> <p>20. Lack of data on the effects of the pandemic and Brexit on population flow.</p> <p>21. Proposals for student halls of residence include educational while some are noted as community.</p> <p>22. Concerns that Barnet leaseholders living in Barnet freehold properties have that in the next 15 years they will not have CPO's issued on them to further Barnet's "regeneration"?</p> <p>Advisory</p> <p>23. Liaison recommended with Thames Water to advise on development phasing.</p>
<p>Site 43 Army Reserve Depot</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <p>1. Size of site seems inadequate to allow families and individuals to thrive, given the number of homes being proposed.</p> <p>2. COVID19 has demonstrated that adequate indoor and private outdoor space is crucial.</p> <p>3. Proposal doesn't indicate what type of properties are being planned. Building high rise accommodation would be extremely distressing for people who live nearby.</p> <p>4. Proposal will impact on social and physical infrastructure. An increase in traffic and noise and disturbance, along with the additional strain of a significant increase in the number of people living nearby is a genuine concern.</p> <p>5. Proposal will have an impact on the conservation area. Concerned about the design and appearance of the development.</p> <p>6. Proposal will increase numbers of cars and traffic, with an increase of people trying to park locally.</p> <p>7. Any improvements to road junctions should follow the Healthy Streets Approach.</p> <p>8. Proposal represents overdevelopment and should be withdrawn.</p> <p>Advisory</p> <p>9. Liaison recommended with Thames Water to advise on development phasing</p>
<p>Site 44 High Barnet Station</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <p>1. Proposal would remove all car-parking facilities.</p> <p>2. Indicative capacity seems excessive given that people need and want more internal space with some external space as people continue to work from home more.</p> <p>3. Appreciate need for new housing, but this should be done with consideration of current residents and new residents.</p> <p>4. Development timeframe should be brought forward to the next five years.</p> <p>5. Use of proportions is unclear and unfeasible. As currently written, it suggests that 25% of the floorspace of the development should be provided as "commercial uses"; it is not clear whether the "public realm and public car parking" also falls within the</p>

	<p>25%. Certainly the provision of 25% for “commercial uses” would be unfeasible, would compete with the designated high street and would not accord with officers’ pre-application advice and Council aspirations.</p> <ol style="list-style-type: none"> 6. Proposal should provide a mix of uses on the site which delivers the housing that Barnet needs and commercial floorspace that is complimentary to the high street at Chipping Barnet (and also Underhill). 7. Delete the reference to the UDP as it is out-of-date and no longer relevant. 8. Support the building of some housing and upgrading of the public realm on this site but proposal misses great opportunity to reconfigure High Barnet as a transport modal interchange. 9. Proposal involves overbearing mass of 6-7 blocks. 10. Serious reservations about the loss of so many car parking places 11. Indicative residential capacity of 292 dwellings is greatly over-optimistic. The quantity of proposed homes should be significantly reduced, and the number of car parking spaces increased. 12. Proposal should provide pedestrian bridge over the railway line to Potters Lane (as it is not possible to provide a footway down the east side of Barnet Hill south of the station slip road) 13. Proposal should be withdrawn from the Schedule of Site Proposals. <p>Support</p> <ol style="list-style-type: none"> 14. Support for requirement that development must reflect the Healthy Streets Approach with improved interchange facilities for pedestrians and cyclists. <p>Advisory</p> <ol style="list-style-type: none"> 15. Liaison recommended with Thames Water to advise on development phasing.
<p>Site 45 Whalebones Park</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Council should secure appropriate provisions (both during construction and operational phases of the development) within the Plan to prevent any undue impacts upon the Queen Elizabeth’s School’s operation and ensure pupil safety. 2. Proposal should be renamed to “Land adjoining The Whalebones” as this would accurately describe the site. This is because The Whalebones itself does not form part of the site and is in separate ownership. 3. Proposal states 2.20 hectares. This should be updated to read 4.3 hectares. 4. Table 4 should be updated to state 152 units and it should be made explicit that the figure is not a maximum requirement. 5. The proposal is unsound because it is in flagrant breach of Council’s own policies regarding Conservation Areas and open spaces, as well as the Mayor of London’s environmental and farming policies. 6. Needs to be more imaginative use of the open space, preferably for educational, therapeutic and food production purposes. Site should be allocated a fraction of the proposed number of homes or omitted altogether. 7. This is a greenfield site in a conservation area. The council’s planning committee was correct to turn down the recent planning application and should not have their decision undermined by including the fields in the Reg 19 sites list. 8. Proposal should be withdrawn from the Schedule of Site Proposals. <p>Support</p> <ol style="list-style-type: none"> 9. Support proposal to deliver a residential-led development, with local open space and community facilities.

	<p>10. Support proportion of floorspace for 90% residential and 10% local open space and community facilities.</p> <p>11. Site is within an Area of Deficiency in Access to Public Open Space, therefore the delivery of new public open space as part of the wider redevelopment of the site would be a substantial public benefit</p> <p>12. Proposal is an opportunity for a sensitive, high quality, residential-led development on the site which would significantly contribute to the significant housing need.</p> <p>Advisory</p> <p>13. Liaison recommended with Thames Water to advise on development phasing.</p>
<p>Site 46 IBSA House</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <p>1. Site was included in the Millbrook Park land use strategy as ‘employment’ and it should be retained as such.</p> <p>2. Site was showing as Residential with 20% B1 uses in Reg.18 Plan and is now showing as residential only</p> <p>3. Site was used as part of the evidence base for the adjacent Millbrook Park development and used as justification for the development mix on this adjacent site, with all employment provision being provided on the IBSA House site. There has been no evidence provided to demonstrate why this employment use is no longer required</p> <p>4. Loss of the employment uses in favour of increased residential provision is not deemed sustainable and only serves to actively encourage movements out the area, contrary to ‘the fifteen-minute neighbourhood’ as set out in the Local Plan.</p> <p>5. Footpath connectivity across this site should be explored and provided.</p> <p>Support</p> <p>6. We welcome that ‘the potential for the development to increase traffic must be assessed and mitigated.’ This may require public transport or active travel improvements as well as offering alternatives to car ownership.</p> <p>Advisory</p> <p>7. Liaison recommended with Thames Water to advise on development phasing.</p>
<p>Site 47 Mill Hill East station</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <p>1. Site makes reference to parking ‘requirements’ or ‘needs’, associated parking or replacement parking spaces. Re-provision of parking and any parking associated with new uses should be minimised, based on demand management rather than predict and provide. Housing is incompatible with requirement to “enhance(s) the capacity, access and facilities of the transport interchange”. Currently 50 % of the total area (measured from the figure in Local Plan Reg 19 site 47) is taken up by rail infrastructure and parking. Reg 19 for site 47 states that 40% should be retained rail infrastructure and parking, which is a <i>20 % decrease from the current figure of 50%</i>.</p> <p>2. To enhance the capacity and avoid overcrowding, the unused land should be reserved for a possible second track and platform within the station itself.</p> <p>3. The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan.</p> <p>4. Proposal should be revised to be consistent with the approach to re-provision of commuter car parking on TfL sites (and therefore sound)</p>

	<ol style="list-style-type: none"> 5. Proposal will impede expansion of train capacity. Thousands of homes are being built that are not within walking distance of the station and that have a reduced number of car parking spaces, with the expectation that public transport and cycling will become the main forms of transport. Therefore parking for cycles in the hundreds will be essential. The car park at Mill Hill East holds 42 car parking spaces. This could be converted to only about 160 cycle spaces, so building on the station car park is unsound. 6. Remove the site as part of Mill Hill East Growth Area 7. Development proposals should take the opportunity to ensure effective connectivity to the Strategic Walking Network <p>Non-Compliance with Duty to Cooperate</p> <ol style="list-style-type: none"> 8. Mayor’s comments have been disregarded. In his response to the Reg 18 he urges Barnet to ensure that vital land necessary for the operations and enhancement of London Underground and rail services – particularly the Northern line – are sufficiently protected. “An assessment of the impact of further large-scale development around Mill Hill East station needs to be carried out. <p>Advisory</p> <ol style="list-style-type: none"> 9. Liaison recommended with Thames Water to advise on development phasing.
<p>Site 48 Mill Hill Library</p>	<p>Advisory Liaison recommended with Thames Water to advise on development phasing.</p>
<p>Site 49 Watchtower House and Kingdom Hall</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Proposal states that 80% of the 7.31 ha, i.e. 5.85 ha, of the site should be retained as undeveloped green belt. This conflicts with the sales particulars for the site which stated that the site is 7.12 ha of which undeveloped green belt is 6.61 ha, meaning that 92.88% of the site is undeveloped green belt. This is confirmed by systematised graphical analysis of the built areas of Barnet's site map which shows 91.4% of the site is undeveloped green belt. 2. Proposal percentages and indicative capacity needs to be recalculated based on Barnet's commitment to the GLA that "Development should not extend beyond the existing footprint of the buildings and should not impact the openness of the Green Belt". 3. Policy GSS07 also needs recalculation in terms of the indicative capacity of 547 new homes from the 3 sites Mill Hill East station, Watchtower House and IBSA House based on Barnet's commitment to the GLA that "Development should not extend beyond the existing footprint of the buildings and should not impact the openness of the Green Belt" 4. Proposed use of “80% retained as undeveloped Green Belt with 18% residential and 2% community floorspace” needs to be confirmed so that will not be any change of use to the large green field on this site (which is covered by Green Belt). 5. No justification is provided for the inclusion of the 18% and 2% figures. If they are intended to reflect the extent of existing previously developed land (PDL) on the site then they are incorrect. The entirety of the Watchtower House (WTH) is PDL (NPPF definition), in that it is land which is occupied by permanent structures and associated fixed infrastructure (including the associated curtilage). 6. A reasonable application of this definition would be that the extent land proposed to be developed with permanent structures

	<p>and associated fixed infrastructure (and the landscape spaces immediately in between them) (the ‘developed envelope’) was equal to or less than the existing, then this should be acceptable in principle.</p> <ol style="list-style-type: none"> 7. The extent of the existing ‘developed envelope’ of the WTH site is 17,264sqm. This equates to 23.8% of the whole site allocation area, rather than the 18% suggested by the draft allocation. The northern part of the KH part of the site comprises PDL. It comprises a ‘developed envelope’ which extends to 3,190sqm. This equates to 4.4%, rather than the 2% suggested by the draft allocation. It follows that a proposed developed envelope that is equal to or less than this should be acceptable in principle. 8. Site 49 is suitable in locational terms for Specialist Older Persons Housing (SOPH) (and the landowner is keen to bring the site forward for SOPH development) and therefore should be considered as an appropriate site to be allocated for conventional housing ‘and/or’ SOPH. 9. There is a clear need for SOPH as shown in the Local Plan targets and LBB evidence base; 10. Site will contribute to an inclusive neighbourhood, by forming a key connection between traditional residential developments at Millbrook Park and NIMR, within the Mill Hill East Growth Area, whilst introducing SOPH to create a more mixed and balanced community. 11. Site is well located to have access to the services within the Mill Hill local centre, to the south of the site and is well served by Public Transport. 12. Requirement for 2% community use floorspace is not justified. Site forms part of a group of local sites that are currently (or have until recently been) owned and occupied by the International Bible Student Association (IBSA). IBSA is a 13. registered charity of the Jehovah’s Witnesses in Britain. The large building most recently used as a Kingdom Hall of Jehovah’s Witnesses falls within Use Class F1(f). (Watch Tower House) is a Sui Generis use not a community use, therefore there are no policy issues associated with its loss. 14. There is no evidence of a need for an alternative community use on the site and restricting 10% of the site’s developable area to community uses would prevent other needs being met (for which there is demonstrable evidence). 15. Proposal is contrary to London Plan Policy G2 (Green Belt), Policy G6 (Biodiversity) and Policy G7 (Trees and Woodlands) 16. Site 49 is contiguous with the Drivers Hill SINC and there is an ecological corridor from Drivers Hill through site 49 to adjacent gardens in Bittacy Park Avenue and Engel Park. Badgers photographed in Bittacy Park Avenue gardens, and barn owls. 17. Proposal is contrary to NPPF para 127: and paras 137, 138, 140, 147, 149, 174a and 189. 18. Remove “Mill Hill Growth Area” from the title, as Green Belt and Growth Area are diametrically opposed. Site 49 can be more sensitively dealt with outside the Growth Area. 19. Remove “Major Developed Site in the Green Belt (UDP 2006)” from the Planning Designation as this in itself cannot justify almost tripling the indicative residential capacity. 20. Adjust the indicative residential capacity down to one which does not extend the footprint, scale, massing and roof height beyond the existing building. 21. Change Key Diagram to remove Site 49. 22. Change Map 3E Mill Hill East Area to remove site 49.
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	<p>23. Change Policy GSS07 to remove “Watchtower House” from the para 3 list of sites for suburban growth.</p> <p>24. Barnet’s Green Belt and MOL Review demonstrates no justification for releasing land designated as such or making significant revisions to existing Green Belt and MOL boundaries. “ Development on this site as proposed will remove site’s designation as Green Belt.</p> <p>25. “Major development” in the NPPF 2021 is defined as 10 or more homes or 1000 m2 of non-residential floor space. This does not in itself justify increasing the built footprint up from the current 5072 m2.</p> <p>26. Replacement of hard-standing (e.g. tennis courts used as parking) by buildings three or more stories high, which would occur if the current 7% footprint went up to 20 %, and the present residential capacity of 85 units went up to 224. This would triple the footprint and built volume, which would not be legally compliant in a Green Belt setting.</p> <p>27. Increasing footprint or building volume will fragment the habitat and be detrimental to biodiversity. There are a number of veteran trees with TPOs (TRE/HE/6 1953) on the site.</p> <p>28. Loss of habitat would be inconsistent with Local Plan Policies ECC05, ECC06 and CDH07 since a development with a larger footprint and volume will mean mature trees removed and they cannot be replaced with a tree of “suitable size and species”.</p> <p>29. impact on the openness of the Green Belt than the existing development “</p> <p>30. Policy seeks to retain 80% of the site as under-developed Green Belt; on this basis, this 80% should be excluded from the allocation boundary Green Belt should be excluded from the site. No special circumstances associated with Green Belt release have not been met and the allocation of this site is not sound.</p> <p>31. Field below the Kingdom Hall, and to the west of the public footpath, should be retained untouched.</p> <p>32. Clarification required on changes from indicative capacity of 219 units in Reg 18 to 224 in Reg 19.</p> <p>33. Proposal covers more than double the area of developed land and will remove a significant green pocket from the within the Conservation Area.</p> <p>34. Housing density proposed will equate to a density of 191.5dph on the development parcel.</p> <p>35. Impact on protected trees will be extensive and this scale of development will be out of keeping with the character and appearance of the Conservation Area.</p> <p>36. Proposal should reference policy CDH08: Barnet’s Heritage as it is within a Conservation Area.</p> <p>37. Para 143 of the NPPF advises that Green Belt boundaries should not include land which it is unnecessary to keep permanently open. It is for this reason that the land identified to be retained as open land on this site, should be retained within the Green Belt.</p> <p>38. Proposal fails to consider the site’s constraints and impact on heritage assets fails to demonstrate that this site, at this scale is deliverable, thus resulting in the policy being unsound.</p> <p>39. Proposal should take the opportunity to ensure effective connectivity to the Strategic Walking Network</p> <p>40. Proposal should take the opportunity to improve the existing footpath and to ensure effective connectivity on foot.</p> <p>Non-compliance with Duty to Cooperate</p> <p>41. Mayor’s Comments disregarded GLA’s response to Reg 18 stated that "Development should not extend beyond the existing footprint of the buildings and should not impact the openness of the Green Belt and policy GSS07 should make it</p>
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	<p>explicit that Green Belt must not be developed, except on previously developed land. This was agreed by the Council. However the Council's responses were duplicitous (not duplicative) and non-cooperative because whilst para 5 of GSS07 was revised, para 3 of GSS07 was not revised to account for the reduction in the number of new residential units that could be delivered i.e. the figure of 547 needs to be revised downwards as it is based on the erroneous estimate of 224 units on site 49, which in turn is based on the erroneous calculation of 80% of the site being undeveloped green belt.</p> <p>Advisory 42. Liaison recommended with Thames Water to advise on development phasing.</p>
<p>Site 50 Watford Way and Bunns Lane</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Proposal should reflect that TfL Operational Property are also looking at an option to use this site for transport operations, which should be referred to in the site allocation to provide flexibility for housing or transport operations or a combination of both. 2. Development proposals should take the opportunity to ensure effective connectivity to the Strategic Walking Network 3. Development proposals should take the opportunity to improve local connectivity on foot. <p>Advisory 4. Liaison recommended with Thames Water to advise on development phasing.</p>
<p>Site 51 Great North Road Local Centre</p>	<p>Advisory Liaison recommended with Thames Water to advise on development phasing.</p>
<p>Site 52 Kingmaker House New Barnet Town Centre</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Proposal represents overdevelopment and should be withdrawn. <p>Advisory 2. Liaison recommended with Thames Water to advise on development phasing.</p>
<p>Site 53 Allum Way Whetstone Town Centre</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Site makes reference to parking 'requirements' or 'needs', associated parking or replacement parking spaces. Re-provision of parking and any parking associated with new uses should be minimised, based on demand management rather than predict and provide 2. Proposal needs to be worded to allow flexibility with regard to future additional operational facilities and allow for additional development if London Underground conclude that the site is not needed. 3. Proposal needs to endorse a comprehensive development approach, reflecting three separate ownerships, a comprehensive development across the land ownership boundaries would be the most efficient way to develop the land for the optimum amount and mix of uses.

	<ol style="list-style-type: none"> 4. Proposal's use of percentage figures is an overly simple approach which may constrain the delivery of new housing and development as well as obstruct the LU operational facilities that may be required on the site. 5. Site capacity figures should reflect that the site could accommodate additional residential development should LU determine that the site is not required for additional infrastructure. 6. Development proposals should take the opportunity to ensure effective connectivity to the Strategic Walking Network <p>Council's strategy is justified</p> <ol style="list-style-type: none"> 7. Support safeguarding of a portion of the site for new London Underground infrastructure required for potential future upgrade of Northern line services and the requirement for station functions to be maintained. <p>Advisory</p> <ol style="list-style-type: none"> 8. Liaison recommended with Thames Water to advise on development phasing.
<p>Site 54 Barnet House Whetstone Town Centre</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Proposal lacks detail to set the broad parameters for development and secure a high quality and contextually appropriate redevelopment. That is what NPPF seeks in terms of high quality, beautiful and sustainable buildings and places 2. Development potential would be better fulfilled through a more detailed site proposal which sets out the broad parameters for development including maximum number of dwellings, indicative floorspace quanta by individual use including replacement employment floorspace. 3. Redevelopment of this site represents an opportunity to improve this relationship through a high-quality design which has due regard to the scale, massing and character of the neighbouring care home and other properties including Paulston House. 4. Density should reflect location which is generally suburban in character 5. Barnet House is not considered to be of any particular architectural significance and is hugely discordant in scale, height and massing to buildings within its immediate context. <p>Advisory</p> <ol style="list-style-type: none"> 6. Liaison recommended with Thames Water to advise on development phasing.
<p>Site 55 Woodside Park Station - East</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Site makes reference to parking 'requirements' or 'needs', associated parking or replacement parking spaces. Re-provision of parking and any parking associated with new uses should be minimised, based on demand management rather than predict and provide 2. Proposal for 20% re-provision of car parking is not 'sound'. Proposal should seek limited re-provision of car parking reflecting the site's highly accessible location and encouraging the use of public transport and active modes of travel. 3. Proposal represents overdevelopment and should be withdrawn. <p>Council's strategy is justified</p> <ol style="list-style-type: none"> 4. Support for continuation (and if necessary, extension) of local parking controls.

<p>Site 56 Woodside Park Station - West</p>	<p>Council’s strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Indicative capacity suggests an excessive Very Tall building completely out of character with the surrounding area, overloading local amenities and overshadowing existing properties. 2. Development commenced to build 86 affordable flats (‘pocket homes’) under 19/4293/FUL. Remove site 56 or replace with details of the approved development. 3. Plans are not legally compliant or sound because they would have a negative impact on the already limited light available to my property in Holden Road. 4. Proposal needs to reflect existence of TPOs 5. Indicative capacity based on a desktop calculation using the site area, PTAL and the density matrix rather than a physical evaluation of the site. 6. The site’s narrowness and need to ensure means of access entails that new homes will be built very close to the rail line creating poor quality housing contrary to policies CDH01 and CDH07. 7. Proposal does not offer a suitable location for housing particularly at the volumes proposed and therefore it fails both the deliverable and developable tests. 8. Site boundary should be redrawn to omit land to the north of Station Approach or a proper site based assessment needs to be undertaken to assess how much of the area would be developable. 9. Proposal should reflect that land to north of Station Approach is a longer term development opportunity, dependent on provision of satisfactory access for pedestrians, cyclists and vehicles. This may require significant redesign of one of the station entrances to the western side of the bridge link at the station. 10. Proposal represents overdevelopment and should be withdrawn. 11. Proposal should ensure effective connectivity to the Strategic Walking network and improve the existing footpath. 12. Proposal should take the opportunity to improve the existing footpaths and to ensure effective connectivity on foot <p>Advisory</p> <ol style="list-style-type: none"> 13. Liaison recommended with Thames Water to advise on development phasing.
<p>Site 57 309-319 Ballards Lane North Finchley Town Centre</p>	<p>Advisory</p> <p>Liaison recommended with Thames Water to advise on development phasing.</p>

<p>Site 58 811 High Road & Lodge Lane carpark North Finchley Town Centre</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Site makes reference to parking 'requirements' or 'needs', associated parking or replacement parking spaces. Re-provision of parking and any parking associated with new uses should be minimised, based on demand management rather than predict and provide Advisory 2. Liaison recommended with Thames Water to advise on development phasing.
<p>Site 59 Central House Finchley / Church End Town Centre</p>	<p>Advisory Liaison recommended with Thames Water to advise on development phasing.</p>
<p>Site 60 Finchley House North Finchley Town Centre</p>	<p>Advisory Liaison recommended with Thames Water to advise on development phasing.</p>
<p>Site 61 Tally Ho Triangle North Finchley Town Centre</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Site makes reference to parking 'requirements' or 'needs', associated parking or replacement parking spaces. Re-provision of parking and any parking associated with new uses should be minimised, based on demand management rather than predict and provide Advisory 2. There are easements and/or wayleaves running through the site boundary. There is a critical trunk sewer running through this site. Liaison recommended with Thames Water to advise on development phasing. 3. Any development proposals that affect the continued operation of the bus station would need to be the subject of early discussion with TfL London Buses.
<p>Site 62 Tesco Finchley Central Finchley / Church End Town Centre</p>	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Site makes reference to parking 'requirements' or 'needs', associated parking or replacement parking spaces. Re-provision of parking and any parking associated with new uses should be minimised, based on demand management rather than predict and provide 2. Proposal not consistent with delivering sustainable development. There would be a loss of biodiversity which is contrary to policy to demonstrate a net gain from a project. 3. Proposal would include a tall building which will reduce the sunlight for about 4 hours a day and have a direct negative impact on the amenity of neighbouring occupiers.

	<ol style="list-style-type: none"> 4. Proposal needs to reflect ground conditions including underground water course and artesian wells, making land unstable for a tall building. 5. Proposal should not include car parking as proposed use due to the well-connected town centre location and future PTAL of 5. Advisory 6. Liaison recommended with Thames Water to advise on development phasing.
Site 63 Philex House	<p>Advisory Liaison recommended with Thames Water to advise on development phasing.</p>
Site 64 774-776 High Road North Finchley Town Centre	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Site makes reference to parking 'requirements' or 'needs', associated parking or replacement parking spaces. Re-provision of parking and any parking associated with new uses should be minimised, based on demand management rather than predict and provide Advisory 2. Liaison recommended with Thames Water to advise on development phasing.
Site 65 Barnet Mortuary (former)	<p>Advisory Liaison recommended with Thames Water to advise on development phasing.</p>
Site 66 East Wing (key site 4) North Finchley Town Centre	<p>Advisory Liaison recommended with Thames Water to advise on development phasing.</p>
Site 67 Great North Leisure Park	<p>Council's strategy unsound as it is not positively prepared, justified, effective or consistent with national policy</p> <ol style="list-style-type: none"> 1. Proposal's indicative residential capacity of 352 units not based on any feasibility studies or consideration of comprehensive redevelopment. 2. Proposal prescription on floorspace breakdown is not justified lacking supporting site-specific architectural feasibility work or analysis of the market demand. 3. Proposal should be shaped by demand and reflect quantum of uses present within the wider area including North Finchley Town Centre. Reflect that this site can provide a complementary leisure offer, rather than competition. 4. Proposal should ensure effective connectivity to the Strategic Walking network and improve the existing footpath. 5. Proposal should take the opportunity to improve the existing footpaths and to ensure effective connectivity on foot Advisory 6. Liaison recommended with Thames Water to advise on development phasing.

	<p>Council's strategy is justified</p> <ol style="list-style-type: none"> 7. Proposal is supported as it will include measures that contribute towards modal shift away from private car use to more sustainable means of transport. 8. Proposal supported with regard to potential for comprehensive or infill residential development utilising space released by existing surface car parking. 9. Proposal supported with regard to the context of a Major Thoroughfare and respond to the adjacent MOL. 10. Council's ambitions for this site closely align with the Vale of Health concept - connecting the neighbourhood physically via access points and pathways, and visually to the surrounding area – using pedestrian friendly streets and public spaces – using efficient building forms that successfully integrate residential uses with other uses and optimise residential quality.
<p>NB Table above only includes sites included in the Reg 19 draft plan and therefore excludes new / additional sites proposed within Reg 19 representations received.</p>	
<p>LEGAL COMPLIANCE</p>	
<p>Consultation</p>	<p>Objection that Local Plan Reg 18 and Reg 19 consultation exercises have not satisfied the following criteria.</p> <ol style="list-style-type: none"> 1. Supporting documents contain factual inaccuracies (e.g. Integrated Impact Assessment for Barnet's Draft Local Plan (Reg 19) May 2021) or multiple omissions e.g. (Key Facts Evidence Paper). 2. Consultation on Reg 18 Local Plan has been reported to the Aarhus Convention Compliance Committee (ACCC/C/2021/185). 3. Consultation did not follow Local Government Association (LGA) guidelines that consultations should last up to 12 weeks 4. Consultation on Reg 18 which started in Jan 2020 placed on deposit one hard copy of the document provided in concealed folder in the Hendon public library. 5. Government on 10 Feb 2020 introduced the Health Protection (Coronavirus) Regulations 2020 which imposed restrictions on any individual considered by health professionals to be at risk of spreading the virus. 6. Secretary of State for Health on 11 Feb reminded the public of the advice to remain in doors for 14 days if they developed symptoms of COVID-19. 7. Secretary of State on 25 Feb 2020 declared that the incidence or transmission of novel Coronavirus constituted 'a serious and imminent threat to public health' and stated that the measures outlined in these regulations were considered 'an effective means of delaying or preventing further transmission of the virus'. 8. Secretary of State on 1 March 2020 set out a Battle Plan, including advising the public to remain and work from home. 9. Prime Minister on 3 March 2020 introduced an 'action plan', including advising more people to work from home. 10. Prime Minister on 12 March 2020 advised that the UK was 'moving out' of contain phase and into delay. He advised that all with symptoms should self-isolate and warned that a national lockdown was approaching. 11. Government on 16 March 2020 published industry guidance including asking people to self isolate for 7 days if they feel unwell. 12. Reg 18 consultation closed on 16 March 2020 after the Secretary of State for Health called for 'unnecessary social contact' to cease.

	<p>13. LGA document, LGA Conversations – New Guide to Engagement, sets out models for ‘good engagement’, in particular, to foster partnership, and allow residents to be informed contributors to the decision-making process.</p> <p>14. HM Code of Practice on Consultation lists seven criteria for managing consultations, including i) when to consult; ii) the duration of the consultation exercise, iii) clarity of scope and impact; iv) accessibility of consultation exercises; v) the burden of consultation; vi) responsiveness of consultation exercises; and viii) capacity to consult.</p> <p>15. HM code also recommends a 12-week period under normal circumstances.’</p> <p>Objection that Integrated Impact Assessment not in accordance with Environmental Impact Assessment Regulations</p> <p>16. Town and Country Planning (Environmental Impact Assessment) Regulations 2017 - Public authorities are required to conduct an Environmental Impact Assessment, which includes the information reasonably required to assess the likely significant environmental effects of the development, listed in regulation 18(3), and comply with regulation 18(4).</p> <p>17. Environmental Information Regulations 2004 (EIR) - Reg 12(5)(3), sets out the basis for exempting information, including the requirements of a public interest test. Council has been withholding information since May 2019 on the Hendon Hub scheme. While EIR Reg 12(5)(3), sets out basis for exempting information, this must be subject to a public interest test. The public interest test was conducted after the production of much documentation, including the EIA Scoping Report, and that this Public Interest Test fails to meet the requirements as stipulated in the EIR, and case law. Complaint filed, on 19 July 2021 with the Office for Environmental Protection, which is under consideration (CMS-241).</p> <p>18. UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention). Council has violated Art 5(1)(a) and Art 5 (1)(b). As a result, complaints have been submitted complaints to the Monitoring Officer, to the ICO and the Aarhus Convention Compliance Committee.</p> <p>19. Article 5 - Collection and Dissemination of Environmental Information</p> <p>20. Article 6 - Public Participation in Decisions on Specific Activities. Violations of the Convention Article 6(4) include failure to provide access to environmental documentation, and by insisting on electronic consultations in the middle of the pandemic which disadvantaged older residents, and those without access to internet; and, unlawfully redacting necessary environmental information in the draft Outline Business Case, contrary to EIR. Violations of the Convention Article 6(8) include failure to take into account the outcome of public participation. LB Barnet has prevented public consultation and scrutiny, including by Natural England, as required by UK regulations regarding adoption of the Local Plan. Council has not published Environmental Policies ECC01, ECC02 ECC02A, ECC03, ECCo4, ECC05, ECC06, that underpin the Local Plan, Reg. 19 on its website.</p> <p>21. Article 7 - Public Participation Concerning Plans, Programmes, and Policies Relating to the Environment. Violations include failure to make appropriate practical and/or other provisions for the public to participate during the preparation of plans and programmes relating to the environment, by failing to publish Environmental Policies ECC01, ECC02 ECC02A, ECC03, ECCo4, ECC05, ECC06, that underpin the Local Plan, Reg. 19 on its website.</p> <p>22. Town and Country Planning (Environmental Impact Assessment) Regulations 2017. LBB has not conducted an Environmental Impact Assessment to assess the likely significant environmental effects of the development around sites 40, listed in</p>
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	<p>regulation 18(3), and comply with regulation 18(4) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.</p> <p>23. LBB published a Scoping Report on 2 June 2021 with regard to planning applications covering proposals 34 to 42 in Hendon. It makes one reference to Natural England but fails to acknowledge the biodiversity of the sites set for development that back onto Sunny Gardens Park and contain mature trees and wildlife habitats. Scoping Report was not available for public consideration until 16 July 2021, and hence there was no opportunity for public consultation. Natural England were not consulted. Neither the Scoping Report, nor the Local Plan Reg. 19 make any mention of protected species that we know live on those sites including bats, birds, and slow worms, and they offer no specific suggestions as to how LBB will mitigate the effects of development on the natural environment.</p>
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