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our ref: City NPPF/2018/Resp

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Dear Mayor Khan

LONDON BOROUGH OF BARNET RESPONSE TO THE DRAFT LONDON PLAN

Following our responses to the City for All Londoners consultation and the Draft Housing and Transport Strategies, the Council welcomes this further opportunity to influence the direction of travel of the London Plan and to respond in more detail to the draft policy proposals. We acknowledge that publication of this document marks a significant step and note that the policy content is consistent with the suite of other Mayoral strategies on which you have already consulted.

The Draft London Plan has been discussed in a workshop with elected Members from Barnet's Planning Committees and Local Plan Working Group, and the response was authorised in draft at a meeting of our Policy and Resources Committee on 13th February. Detailed comments on individual draft policies are provided in Appendix A.

Duty to cooperate and the overarching policy direction

This letter highlights specific policy concerns on the Draft London Plan, as well as the evidence that sits behind it. Our response sets out a willingness to work with the London Plan team to resolve concerns prior to the Examination in Public.

The London Plan together with the Local Plan forms part of our development plan and we recognise it must be taken account of in any planning decisions. It's therefore important these planning documents are the result of collaborative working between London boroughs and the Mayor. Whilst acknowledging this document is more ambitious than previous versions, the Council has concerns about the new look London Plan.

We have significant concerns about the move to a more prescriptive document which, whilst reducing the need to repeat policies in our Local Plan, was not an approach that was discussed with Boroughs or even signalled by City for All Londoners. This is a significant issue which will have a detrimental impact

on Barnet's ability to account for local circumstances when delivering its planning policy framework. The result of this prescriptiveness is undermining the contribution of our residents and businesses to place shaping within the Borough.

We are also disappointed that specific policy recognition for Outer London, as set out in the existing London Plan, has been removed. London-wide policies will be unable to adequately reflect the differing character and contexts across the London boroughs. While of course boroughs face many challenges in common, there are very important differences between Inner and Outer London that necessitate different policy approaches. The combination of the more prescriptive approach and the lack of recognition of Outer London's particular challenges means that several DLP policies are not suitable for Outer London Boroughs such as Barnet. Our concerns on this London-wide approach are set out in more detail in the attachment, but I would draw particular attention to restrictive car parking standards and a blanket London-wide approach to PTAL thresholds which ignores the challenges of orbital transport in Outer London.

Green Belt, Metropolitan Open Land and Open Spaces

The Council shares the Mayor's commitment in the DLP to protect London's Green Belt and open spaces. The Council's planning policy strongly protects the Green Belt, Metropolitan Open Land and other valued open space from inappropriate development. However the DLP appears to take go beyond the NPPF in relation to the Green Belt. Again we question the prescriptiveness of this approach and its merit and justification. An alternative would be for the new London Plan to acknowledge that Green Belt and MOL reviews have already, and are being, undertaken by a number of London boroughs including Barnet, and reinforce that these should feed into Local Plans.

In Barnet over a third of the borough is covered by Green Belt and Metropolitan Open Land, which constrains the amount of land available to develop new large housing development schemes. As noted below, housing targets must reflect the reality of land availability.

Housing

Barnet already has the 4th highest housing target (2,349 per annum) in London due to its existing large programme of growth and regeneration schemes. The Draft London Plan (DLP) proposes increasing this to 31,340 new homes over the next 10 years (3,134 per annum); representing a 33 per cent increase on the current London Plan housing target. Barnet cannot sustain growth at these rates as they are based on impractical assumptions.

We have serious reservations about how the housing target has been calculated. We also have reservations about the lack of collaboration with Boroughs on the methodology behind the proposal for a 'small sites top-up' of 12,040 new homes, accounting for 38 per cent of Barnet's overall housing target.

Barnet already has the largest population of any London borough, with 391,500 residents. Furthermore, Barnet will continue to grow through growth and regeneration schemes already being delivered. Our new Local Plan will reflect this growth as it looks ahead to 2036 (when GLA projections estimate the Borough will be home to 470,000 residents); production of this plan is intended to provide effective management of this growth. Increasing the supply of housing through the delivery of new homes therefore remains a key Council priority, but the London Plan must recognise that Barnet has a distinct lack of additional large brownfield sites.

The London Plan Annual Monitoring Report (AMR) (Table 3.23) shows that Barnet has a net conventional housing pipeline of 20,000 new homes, the 4th highest in London. We have the largest build programme for an outer London borough.

About 42 per cent of these homes are under construction. In 2016/17 Barnet successfully built 2,230 net additional homes.

We acknowledge the need for London as a whole to increase delivery. As set out in previous responses on the London Plan we reiterate that in identifying the next generation of Opportunity Areas the Mayor should encourage other London boroughs that have historically made smaller contributions to now step up and help meet London's housing needs. As well as reflecting on track records of delivery, housing targets must reflect the reality of land availability; this means recognising that in Barnet the vast majority of large sites have already been developed or are currently under construction. Housing delivery in Barnet is largely the result of major, complex and long-term regeneration schemes. This complexity is reflected in the London Plan AMR where Table 3.23 shows that we have had to replace over 4,000 existing homes (the 3rd highest level in London) as part of our housing development pipeline

Barnet cannot simply continue present levels of growth beyond 2030 once the current major regeneration areas and housing estate renewal schemes have been completed without putting pressure upon the continued protection of Green Belt, MOL and other open / green spaces in Barnet, or unless councils are given radical new powers including control of surplus public sector land and the ability to develop over tracks. Barnet's green spaces are one of the major qualities that attract people to live in the Borough and the DLP emphasises that such protected policy areas should not be touched. We therefore have serious reservations about the requirement for and deliverability of the proposed new housing target. Furthermore, we are concerned about the potential adverse impacts that excessive densification and intensification would have on Barnet, particularly in the more suburban and rural parts of the Borough.

We consider there to be major flaws in the approach taken and methodology used by the GLA in producing the Greater London SHMA 2017. These flaws are explained in more detail in Appendix A but the net effect is that it is likely that fewer dwellings will be required, but those dwellings that are provided should be larger. We consider that by acknowledging the contribution that the Borough is already making to London's housing delivery and the impact of these methodological flaws, the new London Plan should set a lower, more realistic and therefore achievable target number of new homes for Barnet; compared with the position given in the DLP.

The DLP proposes a long-term strategic target for half of new homes built in London to be "genuinely affordable". Despite best endeavors, in many cases it is likely to prove very challenging to deliver 50% affordable housing for many Barnet schemes where there are other significant infrastructure and competing demands for Section 106 contributions. Our approach to date has focused on delivering growth at scale, which produces large absolute numbers of affordable homes. The DLP also proposes that any affordable homes that are demolished, are replaced on a like for like basis within the redline of the original estate. The re-provision of affordable housing is complex and estate regeneration must take account of the specific circumstances of each site, including local infrastructure needs, local housing need (tenure mix, affordability and unit size), place-making, viability and the nature of the surrounding area. In some specific instances in Barnet, it is not always viable or desirable to achieve like for like.

As noted above we have serious concerns about the small sites target of 12,040 homes (1,204 per annum) as set out in policy H2, and in particular about the presumption in favour of residential development on sites of less than 0.25ha and up to 25 units. Policy H2 sets Barnet a specific delivery target of 12,040 (or 1,204 per annum). This policy is of concern to this borough; not only is it often very challenging to bring forward development on these type of sites, but the Council does not believe the assumptions behind the number of potential small sites has been sufficiently consulted on with London boroughs in preparation for the DLP. We are particularly concerned that this could open the way to demolition of family housing to create inappropriate flatted development which could significantly alter the character of parts of the borough in an uncontrolled way.

We recognise the intention that this presumption be balanced by the preparation of area-wide design codes. However this idea was introduced without appropriate consultation with boroughs. We are concerned that it creates very significant extra work for which we are not resourced, and as such could easily create a situation where boroughs lack protection against inappropriate development.

DLP (Policy D6) advocates the optimisation of housing densities as a new approach in contrast to the use of the Housing Density Matrix in the existing London Plan. The Council supports proposals for taller and higher density buildings in strategic locations, such as Brent Cross, Colindale and Town Centres like Edgware and North Finchley; subject to there being no unacceptably harmful impact on their surroundings. Developing at higher density can change the nature of neighbourhoods and the communities that live there, and it is therefore important to maintain public support for this type of growth; this includes ensuring the delivery of supporting social and physical infrastructure that is needed to meet local demand.

Through our forthcoming new Local Plan we will be seeking to ensure an appropriate choice of housing is available for all Barnet residents, including recognition of the need for more family homes and protecting houses from inappropriate conversion into flats. A more proactive approach from the Mayor on transforming the potential of transport infrastructure, by building over routes such as the North Circular Road and the Northern Line, could help generate new homes. This is an opportunity for sustainable and suburban place shaping, rather than the adhoc free-for-all approach to small sites that insufficiently considers impacts on character.

Transport and Car Parking

As noted above, we have serious reservations about the DLP's approach to car parking and the adverse impact of more restrictive parking standards for new development, particularly in the northern part of the borough. Continued car use in the lower density suburbs of Outer London remains a reality, irrespective of public transport service and reliability improvements. The Council therefore advocates more flexibility to acknowledge local evidence led approaches to car parking that may be marginally less restrictive than the London Plan in relation to residential and commercial development. The London Plan needs to recognise that even with improvements to public transport, walking and cycling routes, reliance on the car will remain important in outer London boroughs and therefore use of the car in these locations should not be made more difficult than it needs to be. As stated previously we would be happy to discuss our local evidence on car parking with the London Plan team in advance of the Examination in Public.

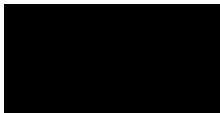
We welcome the strong support given for Crossrail 2 and, predicated on this new line and the decking of the A406, the identification of New Southgate as a new Opportunity Area. We agree that New Southgate has regeneration potential for the quantum of new homes and jobs growth as indicated in the DLP.

Whilst the DLP identifies a number of infrastructure capacity improvements on radial routes, there is a need to prioritise the provision of improved orbital transport links too – including for both train and bus. We welcome the prominence given to the West London Orbital Line from Brent Cross (Dudding Hill line) in the Mayoral Transport Strategy, and ask that it be given accordingly higher priority within the DLP. In particular it should be included in the indicative list of transport schemes associated with draft policy T3.

Finally with regard to public health we welcome the proposal to adopt a health in all policies approach for the first time in a London Plan.

As highlighted above we would welcome the opportunity to continue a dialogue with the London Plan team in advance of the Examination in Public anticipated to take place this autumn.

Yours sincerely



Cath Shaw
Deputy Chief Executive

APPENDIX A – LB BARNET DETAILED POLICY RESPONSE ON DRAFT LONDON PLAN

Barnet Council Detailed Comments on Draft London Plan

Draft London Plan (DLP) Designation / Policy	Barnet Response
<ul style="list-style-type: none"> • Policies drafted in more prescriptive way and are no longer split into the three levels. • Intention to make London Plan policies more directly applicable reducing need to interpret and effectively duplicate them in Local Plans. • For a number of matters the DLP expects boroughs to undertake additional work (e.g. preparing area-wide design codes). These would have significant resource implications for boroughs at a time when resources are limited. • No specific policy recognition for Outer London. 	<p>As drafted the DLP London-wide policies fail to adequately reflect differing character and contexts across the London boroughs. This is of particular concern in Outer London. In order for it to become an effective spatial development strategy serving the needs of all Londoners the DLP should be amended so that the new London Plan:</p> <ul style="list-style-type: none"> ➤ provides scope for local circumstances to be taken into account in Local Plan; ➤ includes specific policy recognition for outer London; and ➤ makes clear that additional work such as design codes is advisory and not a requirement.
<p><i>GG1 Building strong and inclusive communities</i> <i>GG2 Making the best use of land</i> <i>GG5 Growing a good economy</i> <i>SD2 Collaboration in the Wider South East</i> <i>SD3 Growth Locations in the Wider South East and beyond</i></p>	<p>The London Plan aims to accommodate all of London’s growth within its boundaries and without intruding on its Green Belt or other protected land. As highlighted in our covering response, Barnet has serious reservations regarding the ability to achieve this and the harmful impacts of doing so. There are implications for the Wider South East region from the high risk strategy of a more prescriptive London Plan if London is unable to absorb its own growth within its boundaries.</p> <p>Whilst supporting growth corridors into the South East linked to radial infrastructure, the new London Plan should recognise an equally compelling need to invest in orbital infrastructure that is urgently needed to support sustainable ‘good growth’.</p> <p>We note the Mayor’s intention to work with partners across the Wider South East. Such partnerships may address appropriate regional and sub-regional challenges and opportunities and in finding solutions to shared strategic concerns such as barriers to housing and infrastructure delivery, factors influencing economic prosperity, tackling climate change, environmental improvements and waste management. However managing relationships with neighbouring authorities through a “non-statutory strategic structure” is less effective as it is dependent on coalitions of the willing.</p>

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Draft London Plan (DLP) Designation / Policy	Barnet Response
<p><i>SD 1 Opportunity Areas</i> <i>SD 10 Strategic and local regeneration</i></p>	<p>Welcome strong support for Crossrail 2 and the proposed New Southgate Opportunity Area. Adding to Barnet's existing Opportunity Areas at Brent Cross Cricklewood and Colindale, the Crossrail 2 New Southgate station will play a key role in unlocking growth in eastern Barnet, in particular within the New Southgate OA (2,500 new homes and 3,000 new jobs).</p> <p>The new London Plan should acknowledge the significant contributions made by Brent Cross Cricklewood and Colindale to London's growth. In terms of new opportunities in Brent Cross West around the Thameslink station Barnet will be working closely with our neighbours in LB Brent to deliver new growth</p> <p>Whilst welcoming the reference made (para 2.1.55) to the potential of the West London Orbital Line to unlock significant new growth, the new London Plan should give greater recognition, support and prioritisation for early delivery of this West London Orbital rail link.</p>
<p>Intensification Areas</p>	<p>We question why the Intensification Area designation has been removed from the Draft London Plan. The London Plan defines such areas as typically built-up areas with good public transport access which can support redevelopment at higher densities but at lower levels than Opportunity Areas. Mill Hill East one of seven Intensification Areas in the London Plan could be considered an example of good growth in Outer London. Planning frameworks could help realise the potential of Intensification Areas rather than reliance on the incremental delivery of small sites.</p>
<p><i>GG2 Making the best use of land</i> <i>GG5 Growing a good economy</i> <i>SD6 Town centres</i> <i>SD7 Town centre network</i> <i>SD8 Town centres: development principles and DPDs</i> <i>HC6 Supporting the night-time economy</i></p>	<p>We are supportive of the strong town centres first approach and redevelopment of retail and leisure parks to deliver housing intensification to make the most of agglomeration benefits and accessibility of town centres and ensure sustainable patterns of development. However, the new London Plan needs to acknowledge that successfully integrating significantly higher density growth and different land uses within the character of established existing centres will in many instances prove very challenging.</p> <p>The DLP requires Councils to identify centres with particular scope to accommodate higher density housing and sites suitable for higher density mixed-use residential intensification. We have serious concerns about detrimental impacts of excessive amounts of new higher density housing may have on character of town centres – the best use of land does not always mean higher densities.</p> <p>Policy HC6 promotes night-time economy in town centres where night tubes and buses are available. We support ambitions to create more night-time economic activities which cater to a wider cross-section of the population provided that the amenity of neighbouring uses is fully considered.</p>
<p><i>E5 Strategic Industrial Locations</i></p>	<p>We consider the de-designation of the North London Business Park (NLBP) as a Strategic Industrial Location (SIL) to be a sensible change as the strategic designation largely reflected the historical use of the site. In March 2016 the Council adopted a Planning Brief which provides the vision for the transformation of the site into a new mixed used suburban community. We welcome the continued SIL designation of Staples Corner in neighbouring Brent and will in partnership with LB Brent support a proportionate and pragmatic approach to opportunities for growth and accruing benefits in Brent</p>

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Draft London Plan (DLP) Designation / Policy	Barnet Response
	Cross West around the new Thameslink station.
<i>GG3 Creating a healthy city</i>	We welcome the approach to creating a healthier London and support the use of Health Impact Assessments (HIA). Current approaches to improve population health are likely to prove inadequate to achieve sufficient change given the magnitude and pervasiveness of the challenges faced by the NHS and social care. Through challenging local policy and developers to consider the health of the public through HIA we can ensure opportunities for health are built into people's environment.
<i>GG4 Delivering the homes Londoners need H1 Increasing Housing Supply</i>	<p>Barnet's housing target increased by 33% to 31,340 (2019/20 to 2028/29) equating to 3,134 new homes annually. This is the 4th highest borough target after Newham, Tower Hamlets and Greenwich and the highest for an outer London borough. Although 2016/17 saw record completions of 2,230 new homes in Barnet, complex long-term regeneration schemes accounting for Barnet's high target means that in most years we have struggled to come near the existing London Plan target. In addition, even if sites with extant permissions are developed we question capacity of construction sector, in terms of skills and materials, to deliver.</p> <p>The Council objects to the extent of the proposed increase and considers that the SHMA methodology used for arriving at this figure is fundamentally flawed (see below). Barnet cannot continue present levels of growth without impacting adversely on local character, infrastructure and services and the qualities that attract people to live here. Once the major regeneration areas and housing estate renewal schemes have been completed, continued incremental intensification / densification will negatively impact on Barnet's suburban character and put increased pressure on the continued protection of Barnet's Green Belt, MOL and other open / green spaces.</p> <p>To inform our emerging Local Plan Barnet, together with other west London boroughs, have commissioned ORS to produce the West London SHMA.</p>
<i>Greater London SHMA 2017</i>	<p>The Greater London SHMA 2017 identifies a need for nearly 66,000 dwellings per annum across London, which would equate to a 50% increase in the housing stock of London over the period 2016-41. The underlying population projections for the whole of London appear to be plausibly consistent with past trends and they show a projected growth of 79,000 persons per annum, which equates to a growth of 23% over the period 2016-41. Therefore, the project growth in dwellings required in the Greater London SHMA 2017 is more than twice the rate of the projected population growth. The major consequence of this is rapidly falling projected household sizes in London.</p> <p>However, despite household sizes being projected to out-grow population in London, the share of households who are single persons and couples is projected to fall. There is therefore a fundamental inconsistency between the projected number of households in London and the type of households who are projected to exist to the point where both cannot be true. The impact of this difference amounts to hundreds of thousands of homes across London and tens of thousands of homes across West London over the period 2016-41. Therefore, the difference is very important and requires further investigation and almost certainly a lower number of projected households in London.</p> <p>The core issue driving the high rate of household growth in London is the use of household headship rates from the CLG 2014 based household projections. However, we understand that these are due to be replaced by new projections</p>

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	<p>produced by the ONS in mid-2018 using a new methodology that is likely to significantly reduce the projected level of household growth in London. Therefore, if the Greater London SHMA 2017 was to be re-run from mid-2018 onwards it would be highly likely to would produce a much lower objectively assessed need with no other changes.</p> <p>In terms of size and tenure mix, the SHMA model used draws on earlier work undertaken by the GLA and allocates a very high number of one-bedroom dwellings to single persons and couples on low incomes when in practice these households are more likely to occupy shared accommodation. Therefore, it is more likely that fewer dwelling is required, but that those dwellings that are provided should be larger.</p>
<p><i>GG4 Delivering the homes Londoners need H2 Small Sites</i></p>	<p>The new small sites policy, with a presumption in favour of small housing developments on sites under 0.25ha in size and providing between 1 and 25 homes, sets 10-year borough targets for net completions. Barnet's figure for small sites - 12,040 (1204 annually) - is the 2nd highest borough figure. This equals 38% of our proposed London Plan housing target. In 2016/17 a total of 564 units were completed on small sites under 0.25 ha. This equates to 25% of our total completions of 2,230 for 2016/17. We do not consider that this step change will happen within the lifetime of the London Plan.</p> <p>The Council has recently adopted a new Town Centre Framework SPD for North Finchley. The SPD represents the first steps in the future place shaping of North Finchley. Its production has paved the way for Re officers, working with Transport for London, and in partnership with local stakeholders on how the planning proposals it supports should be delivered. Early implementation of the North Finchley SPD help set the standard for town centre revitalisation within Barnet the London Borough with the most town centres (15 in all). We consider that Policy H2 takes us in the opposite direction supporting a fragmented approach to town centre revitalisation, undermining the opportunity for longer term properly considered wholesale redevelopment/regeneration of areas that would provide better communities and infrastructure solutions, ensuring the most effective use of land.</p> <p>Barnet objects to high small sites target number and the lack of collaborative GLA working with boroughs on the SHLAA to arrive at Borough figures. The policy is not considered necessary given that the presumption in favour of development is already enshrined in NPPF.</p> <p>The DLP states that "local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision and increases in residential density through small housing developments" shows a lack of regard for the character of some parts of suburban London. More work on character assessment should be supporting this work.</p> <p>The DLP advocates preparation of area-wide design codes to promote good design and proactively encourage increased housing provision and higher residential densities on small housing developments. However, we are concerned that if made mandatory the introduction of design codes will serve to increase resource burdens for boroughs by removing prospect of pre-application discussions and fees.</p>

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Draft London Plan (DLP) Designation / Policy	Barnet Response
	<p>We are also concerned that the small sites policy is likely to adversely impact on the supply of family houses as well as preventing potential other uses on a site and through an ad hoc piecemeal approach runs the risk of undermining the ability to make best use of land.</p>
<p><i>GG4 Delivering the homes Londoners need</i> <i>GG5 Growing a good economy</i> <i>H5 Delivering Affordable Housing</i></p>	<p>Barnet has concerns about the ability to deliver both the 50% strategic London wide affordable housing target as well as the 50% affordable housing to be delivered on public sector sites such as TfL land. This will prove challenging to deliver on some Council owned sites and adopting a numbers led approach would appear to conflict with the design led approach advocated in other policies in the DLP.</p> <p>With the second year of the GLA's 2015 to 2018 Affordable Homes Programme it is noteworthy that a report by BNP Paribas¹ on the delivery of affordable homes by London boroughs from 2009 to 2015 found that Barnet had delivered 5,029 affordable homes. Only Tower Hamlets, Greenwich, Newham and Southwark had delivered more.</p> <p>Opendoor Homes, a subsidiary of the Council's ALMO, Barnet Homes, has embarked on the delivery of an initial 320 homes for affordable rent for Barnet residents. Working in partnership and building homes through dedicated companies like Opendoor Homes allows development to be undertaken more freely.</p>
<p><i>H6 Threshold Approach to Applications</i> including:</p>	<p>We note that the draft policy reflects the position set out in the Mayor's Affordable Housing SPG adopted in 2017.</p> <p>Whilst welcoming the 35% threshold and fast-track approach to viability to incentivise delivery, we question the appropriateness and ability of the Mayor to alter London Plan policies such as the threshold percentage via Mayoral SPG.</p> <p>The Mayor expects that higher proportions of affordable housing should be delivered on schemes developed by Registered Providers or on publicly owned land. Despite best endeavors, in many cases this is likely to prove very challenging for many Barnet schemes where there are other significant infrastructure and competing demands for Section 106 contributions. However, it should be noted that in Barnet there have been successes at delivering affordable housing at scale. From 2013/14 to 2015/16, there were 834 net affordable housing completions in Barnet, 563 of which are affordable or social rented. Nonetheless, the delivery of levels of affordable housing at the scale and proportion suggested in this draft strategy remains challenging.</p>
<p><i>H7 Affordable Housing Tenure</i></p>	<p>The policy, including the tenure mix sought, reflects the position set out in Mayor's Affordable Housing SPG.</p> <p>We recognise new non-conventional housing products in relation to affordable housing will arise which serves to add to the complex policy landscape. There is need for a clearly understood and applied London-wide definition of affordable housing; in what is already a complex and rapidly changing policy landscape surrounding affordable housing, and therefore a compelling need for a clearly understood and applied London wide definition of affordable housing. We</p>

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	<p>caution that further additional products, such as London Affordable Rent and London Living Rent, risk adding to existing complexity and could serve to frustrate affordable housing delivery.</p> <p>The Mayor’s Draft Housing Strategy proposes that any affordable homes demolished are replaced on a like for like basis. The re-provision of affordable housing is complex and estate regeneration must take account of the specific circumstances of each site, including local infrastructure needs, local housing need (tenure mix, affordability and unit size), place-making, viability and the nature of the surrounding area. In some specific instances in Barnet, it is not always viable or desirable to achieve like for like. For example, on the Grahame Park estate it is likely that there will be a small net loss of social housing measured by number of units. However, there is a preponderance of two-bedroom dwellings on the estate that has led to significant overcrowding. The new dwelling mix proposes more large homes and actually leads to an improved balance of "bed spaces" on the estate. In addition, significant development of social housing is already planned on nearby sites across the wider Colindale Opportunity area which will improve the balance of rented homes/owner occupation as well as more than meet the deficit of rented homes on Grahame Park.</p>																		
<p><i>H12 Housing Size Mix</i></p>	<p>H12 emphasises that boroughs should not set prescriptive dwelling size mix requirements (in terms of numbers of bedrooms) for market and intermediate homes. The Council is concerned that adopting this policy approach impacts on the ability of individual boroughs to meet local need. London needs a balanced population and there is a need to provide family sized homes in a suburban context; Barnet together with its WLA partners has commissioned a West London SHMA to help identify existing priorities. With regard to the GLA London-wide 2017 SHMA findings initial results from the West London SHMA have highlighted concerns about the lack of accommodation for larger families. In Barnet as illustrated in the table below, there is a need for more 2-bed rather than 1 bed properties and therefore support the provision of more 2 and 3+ bed units on schemes.</p> <table border="1" data-bbox="896 970 1917 1398"> <thead> <tr> <th align="center">Property Size</th> <th align="center">Total No of households</th> </tr> </thead> <tbody> <tr> <td align="center">1-bed</td> <td align="center">779</td> </tr> <tr> <td align="center">2-bed</td> <td align="center">1119</td> </tr> <tr> <td align="center">3-bed</td> <td align="center">663</td> </tr> <tr> <td align="center">4-bed</td> <td align="center">213</td> </tr> <tr> <td align="center">5-bed</td> <td align="center">42</td> </tr> <tr> <td align="center">6-bed</td> <td align="center">6</td> </tr> <tr> <td align="center">7-bed</td> <td align="center">2</td> </tr> <tr> <td align="center">Total</td> <td align="center">2,824</td> </tr> </tbody> </table>	Property Size	Total No of households	1-bed	779	2-bed	1119	3-bed	663	4-bed	213	5-bed	42	6-bed	6	7-bed	2	Total	2,824
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<i>H13 Build to Rent</i>	Whilst welcoming this new policy on a tenure that can make a greater contribution to housing supply, we caution about adding increased complexity. The Council recognises the potential benefit of Build to Rent to support additional housing delivery in the capital and we intend to support the delivery of a Build to Rent scheme as part our plans for Brent Cross Cricklewood.
<i>H15 Specialist Older Persons Housing</i>	<p>We agree the C2 and C3 use class distinctions made in the DLP regarding sheltered, extra care and residential care home accommodation but question the basis of partnership working and robustness of evidence used to justify support Barnet's high annual figure. Barnet's 275 unit annual benchmark figure (2017-2029) for specialist older persons housing (C3) is the highest Borough figure set. The Council is opposed to the prescriptive inclusion of this annual top down' target figure within London Plan policy, considering that this matter should be addressed within the Local Plan .</p> <p>Addressing the housing needs of older and disabled people is a key consideration for the Council and forms part of the Barnet's commissioning strategy to increase Extra Care Housing in the Borough. We are already building a 53 bed Extra Care unit through the Housing Revenue Account and utilising Right to Buy receipts to support this scheme and would welcome continued support and investment from the Mayor for more specialist housing.</p>
<i>H16 Gypsy and Travellers accommodation</i>	<p>The DLP requires the use of a new definition for gypsies and travellers due to concerns that the existing Government planning definition fails to recognise those who have ceased to travel or live in (bricks and mortar) housing. Clearly this approach remains to be tested and we would question the robustness of GLA's justification for deciding to depart from national definition of travellers and particularly whether such an approach is likely to be supported by Government.</p> <p>Barnet has jointly commissioned ORS to produce a West London assessment for gypsies and travellers' accommodation needs (GTANA). Initial findings from the West London GTANA highlight that the levels of need required under the London Plan definition significantly exceed the levels of need under the Government planning definition. Note that this currently excludes any assessment of need from households living in bricks and mortar which is likely to increase the levels of need by some margin. According to our consultants it is estimated that it costs approximately £100k to put in place a new public pitch and in the region of £5m per hectare for land purchase in West London. Therefore the financial implications are huge if the London Plan definition were to be adopted.</p>
<i>Policy D1 London's form and characteristics</i>	It is largely recognised that the same health benefits are not achieved through low quality greenspaces as high-quality spaces-regardless of accessibility ²³ . Public health supports the protection of high quality and high value green spaces but

² Gascon, M., Triguero-Mas, M., Martinez, D., Dadvand, P., Rojas-Rueda, D., Plasencia, A., Nieuwenhuijsen. (2016). Residential green spaces and mortality: A systematic review, Environment International, 86, 60-67.

³ Dzhambov, A.M. & Dimitrova, D.D., (2014). Urban green spaces' effectiveness as a psychological buffer for the negative health impact of noise pollution: A systematic review, Noise Health, 16(70), 157-165.

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	<p>would like the Mayor to recognise how funding concerns may impact quality (and consequently health) in the longer term. Being strategic about the types of open spaces that are protected may be a more valuable and efficient approach and may also help meet additional demands set out in the London Plan. Additionally, the Mayor could explore alternative methods for funding the upkeep of open spaces so that all protected open spaces can be high quality.</p>
<p><i>GG2 Making the best use of land</i> <i>D2 Delivering Good Design</i> <i>D6 Optimising Housing Density</i></p>	<p>These policies set out the approach to optimising housing density, key aspects of which are:</p> <ul style="list-style-type: none"> • A move away from use of residential density matrix; instead for LPAs and developers expected to agree densities on a site by site basis with no maximum densities set; • Promoting the most efficient use of sites achieved through a design-led approach to optimising housing density and for higher density development to require higher levels of scrutiny of design. • The need on most sites to develop at densities above those of the surrounding area. • Incremental change anticipated in outer London where suburban pattern of development has significant potential for residential intensification. • Developments that fail to optimise housing density of the site should be refused. <p>The DLP is explicit in stating that the suburbs will be expected to change and become denser. Whilst there is emphasis on existing character, Barnet has serious concern that in Outer London boroughs character may be sacrificed to meet growth. ‘Good growth’ and mixed and balanced communities requires provision of a commensurate supporting social infrastructure and the importance of placemaking – leading by example it will be necessary for the Mayor to ensure that the development of TfL station sites delivers this and does not adversely impact on local areas.</p> <p>We also have concerns regarding the resource implications of undertaking design analysis and producing design codes to manage development will necessitate extra work as Barnet has limited analysis to date. Whilst Policy D2 is supported in principle in the context of challenges to Boroughs’ planning departments in terms of capacity, this level of assessment will be challenging. Apart from conservation areas, many local authorities will not have detailed assessments of their areas. We consider that Determining Capacity for Growth (Part B) is largely unrelated to many of the items described in part A. Most relevant items in Part A are 3 and 9. Items 1, 2, 7 (except where there are heritage assets) and 8 are hardly required to determine the capacity for growth.</p> <p>Barnet Public Health is developing local evidence to support Local Plan policies and thereby ensure that the public’s health is optimized through local policy.</p>
<p><i>Policy D3 Inclusive design</i></p>	<p>We support recognition that inclusive design is critical to health, independence, and social wellbeing across the lifespan. The social model of disability is already adopted within Barnet. Additionally, Barnet’s Green Infrastructure SPD recognises the importance of the World Health Organisation’s, “Age-friendly cities checklist”. As the population of London changes, it will be critical that communities embody elements of age-friendly design, and we recommend that</p>

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	<p>these elements are considered within pan-London work.</p> <p>The need to provide additional reassurance post Grenfell Tower is understandable but there needs to be clarity on what the role of planning is and what is covered by other legislation such as building regulations. Some of these elements, in association with policy D10 Safety, Security and Resilience to Emergency, currently unacceptably blur lines and increase expectations on planning.</p>
<i>Policy D4 Housing quality and standards</i>	<p>In ensuring that minimum design standards are met and providing flexibility on some issues, such as dual aspect where the case for alternatives can be shown to be necessary this policy is supported.</p>
<p><i>D5 Accessible Housing</i></p> <ul style="list-style-type: none"> • At least 10% new build dwellings to be designed as wheelchair accessible or easily adaptable for wheelchairs • All other new build dwellings to be accessible and adaptable dwellings. 	<p>Support. However we consider that the supporting text could clarify the extent to which it applies to new dwellings. Policy D5 states its application to “residential development” but the supporting text refers to its application to “all new build dwellings”. This creates ambiguity with regard to changes of use to residential and conversion.</p>
<i>Policy D7 Public realm</i>	<p>The provision of free drinking water is supported - sugary drinks are the single largest source of sugar in children’s diets and encouraging free and accessible options can make a positive contribution. Additionally, single-use non-recyclable plastic water bottles are costly both to the consumer and the environment. However, we recognise that an individual water fountain can cost >£2,000 and it is unrealistic to expect local government to be able to fund the cost of access and ongoing management in all public spaces. To encourage London boroughs, we recommend the Mayor provides some initial funding which local authorities can use to target communities most in need.</p> <p>By adopting a junk food marketing levy on TfL advertising space, the Mayor could use money raised to fund accessible drinking water. This would also demonstrate the Mayor’s commitment to improving the health of Londoners and the environment which he has identified as a strategic ambition within all Mayoral strategies.</p>
<i>G2 London’s Green Belt</i>	<p>Barnet welcomes the continued strong policy protection afforded to the Green Belt and support for its extension where appropriate. However, we note that de-designation is not supported and that an apparent stronger policy stance is proposed than that set out in NPPF. To inform the emerging Local Plan Barnet is currently undertaking a study of its Green Belt and MOL and, in line with the NPPF, wants to reserve the right if necessary to make Green Belt boundary changes via Local Plan process where they can be justified.</p>
<i>G3 Metropolitan Open Land</i>	<p>We agree with policy stance for protecting Metropolitan Open Land (MOL) from inappropriate development, the criteria for designating MOL, that alterations to MOL boundaries should be undertaken through the Local Plan process and proposals to enhance access to MOL. However, we have reservations about the reference made in supporting text (para 8.3.2) regarding the principle of land swaps being applied to areas of MOL where the resulting MOL meets at least one of the policy criteria. This is too simplistic and is in danger of failing to properly understand the rationale for identification of areas of MOL in the first place.</p>

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<p><i>GG3 Creating a healthy city</i> <i>G1 Green Infrastructure</i> <i>G4 Local green and open space</i> <i>G5 Urban greening</i> <i>G7 Trees and woodlands</i> <i>G8 Food growing</i></p>	<p>We welcome and generally support the approach to green infrastructure set out in the DLP. Barnet's recently adopted Green Infrastructure SPD broadly reflects and is consistent with DLP policies on Green Infrastructure and Natural Environment. Barnet recognises the need for food growing spaces within the Green Infrastructure SPD and will give consideration to the inclusion of a policy within our new local plan which further supports community food growing.</p>
<p><i>GG6 Increasing efficiency and resilience</i> <i>D3 Inclusive Design</i> <i>D7 Public realm</i> <i>D10 Safety, security and resilience to emergency</i> <i>D11 Fire Safety</i></p>	<p>Following the Grenfell Tower disaster and terrorism attacks in London in recent years the changes made reflected through this suite of DLP policies are understandable and generally supported. Public realm design needs to take account of / be resilient to terrorism.</p> <p>The Council and Barnet Homes take fire safety extremely seriously; there are already extensive measures in place to ensure that our homes comply with fire safety regulations. All our high-rise blocks have fully up to date Fire Risk Assessments in place. A further review of fire safety measures in our high-rise blocks was carried out to identify any measures that are required to move beyond legislative compliance to deliver best practice in fire safety including the consideration of sprinkler systems, improved fire and smoke alarm systems and other measures.</p> <p>We would however question whether requiring a Fire Statement for major development is potentially straying into non-planning matters. Undertaking robust assessment of such statements could prove challenging for many boroughs.</p> <p>The London Plan will need to reflect the conclusions and Government response to the Independent Review of Building Regulations and Fire Safety expected from Spring 2018.</p>
<p><i>GG1 Building strong and inclusive communities</i> <i>GG3 Creating a healthy city</i> <i>E11 Skills and opportunities for all</i></p>	<p>We support the increased focus given to and inclusion of over-arching good growth policies emphasising the need for planning and development to ensure delivery of strong and inclusive communities founded on openness, diversity and equality and reduce health inequalities.</p>
<p><i>GG5 Growing a good economy</i> <i>S1 Developing London's social infrastructure</i> <i>S2 Health and social care facilities</i> <i>S3 Education and childcare facilities</i> <i>S4 Play and informal recreation</i> <i>S5 Sports and recreation facilities</i></p>	<p>This suite of policies highlights the need for boroughs to undertake a needs assessment of social infrastructure and identify sites for future provision. New facilities should be easily accessible by public transport, cycling and walking. Proposals resulting in a loss of social infrastructure (includes health, provision, education, community and recreation) as well as green infrastructure in "areas of defined need" should be refused unless able to be re-provided. Also, that redundant social infrastructure to be considered for other social infrastructure types before any alternative development.</p> <p>Whilst supportive of the intent of these policies and investment in infrastructure, we would welcome more support from the Mayor in helping to deliver infrastructure.</p>

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	<p>We welcome Mayoral support for importance of ensuring suitable childcare provision and accessibility of play spaces by active travel as planning considerations. However, the new London Plan should recognise that detailed planning for social infrastructure is best achieved at Borough level so as to ensure proper account is taken of the different needs and priorities of individual communities and neighbourhoods.</p> <p>Public health intelligence can be used to identify the needs of communities as well as gaps in social infrastructure. Barnet's new Local Plan will therefore consider local health intelligence when identifying priorities.</p>
<p><i>S6 Public toilets</i> <i>D7 Public realm</i></p>	<p>We support policy on provision of public toilets in large publicly accessible developments. Recognition of the importance of public toilets is already acknowledged within the Council's Green Infrastructure SPD. This policy could usefully work in tandem with DLP Policy D7 support for accessible and free drinking water</p>
<p><i>GG5 Growing a good economy</i> <i>E1 Offices</i></p>	<p>We support policy recognition that diverse office markets in Outer London should be consolidated and where viable, extended, and to the focusing of new office development in town centres and other existing office clusters. We are also pleased to see explicit reference given to the need to retain existing viable office space in Outer London locations and to ensuring that office functions are not undermined by permitted development rights. We therefore welcome support given in the DLP to the introduction of Article 4 Directions to address adverse impacts of office to residential permitted development rights. Between May 2013 and January 2018 Barnet lost 37,829sqm of office space from the completion of 69 prior approval applications (which delivered 647 new private homes and no affordable units).</p> <p>Our recent Employment Land Review produced by Ramidus Consulting recommended business locations which would benefit from Article 4 protection</p>
<p><i>E2 Low-cost business space</i> <i>E3 Affordable workspace</i> <i>E4 Land for industry, logistics and services to support London's economic function</i> <i>E11 Skills and Opportunities for all</i></p>	<p>These DLP policies state that the provision and protection of range of low cost B1 business space for SMEs should be supported and that B1 proposals over 2500sqm should consider providing a proportion of flexible workspace for SMEs.</p> <p>We welcome Policy E2. However greater clarity is required on the re-provision of low cost space, if this is not affordable workspace.</p> <p>We welcome Policy E3. The language of 'affordable workspace' itself is an issue. Our Employment Land Review highlighted that a Local Plan policy on this issues should be supported by a specific description of the typology of space and who it is intended for. Encouraging developers to liaise with workspace providers at pre-application stage rather than just at 'an early stage' would be a helpful revision to the London Plan. In order to secure long-term affordability and supply, it would also be helpful if the London Plan made reference to affordable workspace being granted on a long lease or secured in perpetuity.</p> <p>We support Barnet's categorisation as a Borough that should retain industrial floorspace capacity in Table 6.2. Our Employment Land Review recommended that in order to intensify economic activity Barnet should retain a range of</p>

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	<p>employment stock and continue to provide buildings and land from which ‘industrial’ type businesses can service the needs of the wider London economy. Providing more certainty about the protection of employment land should help in attracting investors.</p> <p>We welcome policy support for small businesses and objectives of providing and protecting low cost business space, securing affordable workspace and promoting contributions to employment, apprenticeships and training opportunities. Barnet has made progress through its SPD adopted in 2014 on securing contributions to skills, employment, enterprise and training.</p>
<p><i>E6 Locally Significant Industrial Sites</i> <i>E7 Intensification, co-location and substitution of land for industry, logistics and services</i> <i>E8 Sector growth opportunities and clusters</i></p>	<p>Barnet has lost a significant amount of employment space to residential uses in recent years, largely precipitated by changes to the Use Classes Order. It is therefore particularly important that the London Plan recognises the economic potential in, and importance of, encouraging commercial growth in key Outer London locations.</p> <p>Our recent Employment Land Review highlighted that Local Plan policy should encourage investment in our LSIS as a source of supply of small units with intensification and a mix of commercial uses encouraged,</p> <p>New stock is likely to use land more intensively and to provide more flexible space that is appropriate to modern business processes. Our Local Plan will consider a move towards encouraging the development of hybrid space (or the hybridisation of existing space) whilst inconsistent with its nominal intended use (from a market or planning use class point of view) may be the most effective way of ensuring that at least some employment land stays in employment uses, rather than rigidly sticking to use class-based conventions the value for which will not support redevelopment in a reasonably foreseeable time frame. However, the relaxation of PDR complicates the encouragement of greater flexibility in responding to market change.</p> <p>Whilst welcoming the recognition of Strategic Outer London Development Centres at Policy E8G which seeks to support the growth of economic opportunities beyond central London we are disappointed at the lack of strategic direction in the DLP with regard to such locations. Hardly any Outer London locations of greater than sub-regional importance including Brent Cross Cricklewood are identified in the Policy or supporting text</p>
<p><i>E9 Retail, markets and hot food takeaways</i></p>	<p>We support the Mayor’s recognition that unhealthy food accessibility significantly impacts consumption. We welcome the support for resisting new hot food takeaways within 400m of a school, as well as managing an overconcentration of such uses and the flexibility for Boroughs to set a locally determined and evidence based distance from schools. Part C of the Policy could be clearer if it specified that the 400 metre threshold would be from the entrances of schools. We would also welcome guidance from the London Plan on what will constitute sufficient justification for a locally based threshold. The Council is exploring what hot food takeaway policy stance would be most appropriate for the Local Plan. Informing this consideration, Barnet Public Health is conducting a Healthy Weight Needs Assessment. Based on our findings we cannot expect to meaningfully prevent diabetes and other chronic conditions unless health becomes the easy option for</p>

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	residents.
<i>HC7 Protecting public houses</i>	<p>We support policy protection for existing public houses where they have a heritage, economic, social or cultural value and where they contribute to wider policy objectives for town centres and the night-time economy.</p> <p>Supporting proposals for new public houses should however be applied with caution and where necessary, permission should be granted following a review of local health needs and issues⁴. Additionally, the Mayor should explore the possibility of supporting The Best Bar None Scheme as a condition for new Public Houses⁵. This will also promote London Plan Policy HC6.</p>
<i>S11 Improving air quality</i>	<p>Barnet generally supports the approach to improving air quality and applying the zero-carbon target to non-residential major developments. As stated in our response to the draft Mayor’s Transport Strategy, we welcome the Mayor’s recognition that poor air quality has a larger impact on the health of marginalised communities and vulnerable people. However, whilst the Mayor has announced a major drive on air quality and set strong ambitions, he has only brought forward the ultra-low emissions zone (ULEZ) proposal to include the area up to A406 North Circular, therefore largely excluding Outer London boroughs. Furthermore, given the number of strategic TfL-managed roads passing through the Borough and the clear connection from the evidence with poor air quality hotspots in Barnet, the Council would like to understand what the Mayor will be doing to address air quality problems that will benefit our residents given that the main source of air quality issues lies fully within his control.</p>
<p><i>S10 Aggregates</i> <i>S17 Reducing waste and supporting the circular economy</i> <i>S18 Waste capacity and net waste self sufficiency</i> <i>S19 Safeguarding waste sites</i></p>	<p>With increasing levels of flatted development, and known lower levels of recycling within flats (both new and old) compared with houses we question how the Mayor will be supporting boroughs to deliver on their waste targets. Barnet in partnership with six other London Boroughs is producing the North London Waste Plan (NLWP). The Programme Manager for the NLWP has submitted comments on the DLP waste policies on behalf of the seven participating boroughs.</p>
<p><i>GG6 Increasing efficiency and resilience</i> <i>S13 Energy infrastructure</i></p>	<p>In seeking improved energy efficiency and a move to a low carbon circular economy with London becoming zero carbon city by 2050 we consider that there is scope for the Mayor to do more to encourage innovation and start-up investment. This is critical to technological advancement in supporting new ways of generating electricity at a local level.</p>

⁴ Public Health England (08.03.2017). Alcohol licensing: Understanding and applying public health data. Retrieved from, <https://www.gov.uk/government/publications/alcohol-licensing-understanding-and-applying-public-health-data/alcohol-licensing-understanding-and-applying-public-health-data>

⁵ <http://bbnuk.com/>

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<p><i>T1 Strategic approach to Transport</i></p>	<p><i>Development Plans should support Mode Splits of 80% of all trips in London to be made by foot, cycle or public transport.</i></p> <p>The aspiration to increase sustainable travel to a mode share of 80% presents significant challenges for Outer London, where the car remains an important mode of transport. Data included in the draft Mayor’s Transport Strategy (MTS) (p277 fig 57) shows that journeys within both central and Inner London already meet or exceed the 80% target. The overall corresponding figure in Outer London is 64%, and for Barnet 55%. This approach needs to seriously consider that a significant number and proportion of car trips within and across Barnet originate elsewhere and are between origin and destination points outside of the Borough on key strategic routes (e.g. M1, A1, A41, A406). Equally, the origins and destinations of traffic on these routes are not necessarily within Barnet and the final London Plan must also acknowledge that traffic reduction strategies will require cross-borough collaboration and greater input, and potentially funding, from TfL.</p> <p>The final London Plan must place adequate responsibility on those who administer such roads (TfL and Highways England) to help contribute to vehicle reduction targets on their networks in Barnet, especially in relation to freight for which we would welcome a clear strategy from both bodies on how to deal with this at a local level.</p> <p>The London Plan needs to accord greater recognition to the importance of improving orbital links – particularly for public transport.</p> <p><i>Working to minimise servicing and delivery trips through efficient and sustainable essential freight functions.</i></p> <p>Despite London boroughs and TfL having very limited control over freight trips Barnet will undertake work on a North London Freight Study to develop policies in line with the Mayor’s aspirations. The Council will continue with its planned freight consolidation strategy. More details are required on how freight strategy can meaningfully contribute to the overall mode share targets, and how despite the various constraints we face that the Boroughs and TfL can work together to deliver on the Mayor’s policy aspirations.</p>
<p><i>T3 Transport Capacity, connectivity and safeguarding</i> <i>T4 Assessing and mitigating transport impacts.</i> <i>T9 Funding transport infrastructure through planning</i></p>	<p>These policies seek to ensure provision of sufficient suitably located land for current and expanded public and active transport system.</p> <p><i>Safeguarding existing land and buildings used for transport or support functions</i></p> <p>It is necessary to recognise and give due consideration to existing physical constraints at a local level. The Brent Cross development proposals and Colindale CPO for over station development involve significant physical challenges. Golders Green also has potential issues regarding height and density of proposals.</p>

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	<p><i>Safeguarding route alignments</i></p> <p>1) West London Orbital/ Dudding Hill Line</p> <p>The West London Orbital is included in the draft MTS as a possible route to be reopened and the DLP commits the Mayor, TfL and relevant London boroughs to involvement in a feasibility study for the scheme (MTS proposal 83, p. 209). Connecting a number of regeneration areas including Brent Cross, OPDC and the Great West Corridor, this line has the potential to unlock c20,000 new homes across the sub-region. We want this route to be reopened in order to support sustainable and convenient orbital movements and town centre growth and reduce demand on the North Circular. At present, options for a route to Cricklewood or northwards via Brent Cross are being tested for initial feasibility by the West London Alliance and commitment towards this scheme from the Mayor should be tightened with more detailed reference to West London Orbital provided in the final Plan.</p> <p>Barnet considers that the programme for the London Overground Extensions 2030-41 is not of sufficiently high priority and therefore request a commitment to earlier delivery of West London Orbital as a critical piece of infrastructure by the mid to late 2020s.</p> <p>2) Crossrail2</p> <p>The inclusion of New Southgate station in the draft MTS as a station on Crossrail 2 is positive for Barnet. Crossrail 2 can play a key role in unlocking further growth in eastern Barnet and support reduced car-dependency development within certain ward areas of Barnet.</p> <p>However, the draft MTS and Implementation Plan insufficiently clarify the phases by which branches such as New Southgate to Seven Sisters are to be delivered. While the Council recognises the need for effective and responsible financial management of Crossrail 2, it will be of great benefit to Barnet if the New Southgate extension is speedily delivered. At the very least, the final London Plan should give greater indication as to the phases and dates by which specific parts of Crossrail 2 are expected to be delivered.</p> <p><i>Safeguarding the Walk London network</i></p> <p>Barnet supports this initiative, particularly with regards to Outer London routes and the orbital path.</p> <p><i>Upgrades to Underground Lines</i></p> <p>More detail is required on what this will entail for lines within Barnet. However, the London Underground Station Capacity Programme (2017-40) is strongly supported with regards to the Piccadilly Line and Northern Line and the introduction of</p>

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	<p>capacity upgrades as soon as these can be practicably brought forward.</p> <p>Barnet also welcomes the recent announcement on Step Free access for Burnt Oak. The programme should also include review of Step free Access for Mill Hill East/Colindale/Brent Cross/Arnos Grove via developer contributions and as part of the Stations Upgrade programme. Further details are required on proposals for the Night Tube.</p> <p><i>Indicative List of Transport Schemes</i></p> <p>It is noted that there is an intention to reallocate bus capacity from Central to Outer London and that bus network enhancements are also included as a medium priority within the DLP. The bus network will be crucial for Barnet in achieving mode share targets. Improvement of orbital routes is especially important, and while this is acknowledged in the DLP, further detail is needed on proposals to reallocate bus capacity and specific strategies required to address the challenge of orbital routes in Outer London.</p> <p>Barnet supports devolved suburban rail services to enable London suburban metro with regards to the Moorgate Branch through Oakleigh Park. We also strongly support devolution of the rail line to TfL to improve frequencies /services.</p> <p>The inclusion of Crossrail 2 (2020-2040) and Thameslink (2017-2020) with high priority status is welcomed. The Brent Cross Cricklewood development is Barnet’s most significant growth and regeneration programme and is underpinned by the construction of a new Thameslink railway station, delivered by the Council with Network Rail, which will provide a link to King’s Cross St Pancras in under 15 minutes. Barnet is seeking to bring forward the delivery of the new Thameslink Station and associated works within the Brent Cross/ Cricklewood planning permission, to deliver the new station in 2022, as compared to 2031. To do so the applicant is proposing to establish two new Thameslink sub-phases within the existing planning permission.</p> <p>While we accept that electric vehicle usage is becoming more wide spread, we would like to see the provision for charging infrastructure implemented in line with demand in Barnet, not London as a whole. This is due to existing demands on kerb space within the Borough.</p> <p>Policy T4 specifies circumstances whereby financial contributions should be sought to address adverse transport impacts and direct provision of public transport, walking and cycling facilities. It also recognises that there may be circumstances where additional public transport and active travel infrastructure may need to be provided. This could include additional bus stops and on street improvements. We would welcome additional information in the London Plan on how this process is envisaged to operate under the current system and Development Management guidelines.</p> <p>This section mentions a wide range of assessments which need to be considered for future development impacts on the</p>

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	<p>surrounding highway and its users. We are concerned that no assessment on the impact on parking stress has been made. This is a key issue for Barnet should the reduction in parking provision associated with this document be progressed.</p> <p>“Development proposals should not increase road danger.” This is welcomed; however, it would be beneficial for all highway users if this section of the policy is expanded to cover improvement of existing issues of road safety on the immediately surrounding highway.</p>
<p><i>GG3 Creating a healthy city</i> <i>GG5 Growing a good economy</i> <i>T2 Healthy streets</i></p>	<p>We consider the Healthy Streets Approach to be a positive and forward-thinking policy.. Development proposals should deliver patterns of land use that facilitate shorter, regular trips by walking or cycling, and the design and management of street environments should make cycling and walking more attractive, safer and more accessible. However, the local context in Barnet needs to be considered in terms of how these aims can be delivered. There are major barriers to reducing severance from major highway corridors (A5, A41, A1000, A406) to non-motorised road users, and reducing emissions originating outside the Borough. Significantly increasing levels of walking, cycling and public transport use will require a multi-faceted approach to deal with the diverse range of local circumstances in different parts of the Borough. We would also like to see a strong emphasis on road safety.</p> <p>Development of the healthy streets check for designers provides a more consistent, efficient and predictable application of healthy planning principles and clarification around the Healthy Streets Indicators⁶. It will be critical to see how this is applied within Outer London v. Inner London LIPs. Regardless, ensuring all development applications have regard for public health is welcomed.</p> <p>Without investment in transformative projects such as building over transport infrastructure such as London Underground lines and sidings the potential for development of new housing around stations will remain restricted in addition to the places limited by historic development patterns and physical constraints. An example of this is Golders Green.</p>
<p><i>Policy T5 Cycling</i></p>	<p>Barnet welcomes the DLP commitment to providing improved cycling infrastructure. However, it will be important to deliver this in the context of the Outer London environment and carefully review safety, usage and funding. The LIP funding and TfL funding overall has been cut just when pressure is increasing on boroughs to deliver.</p> <p>We note that whilst higher minimum cycle parking standards will not apply in Outer London, , an exception has been made for certain locations including Edgware. We request that further clarification is provided on the justification and reasoning behind this.</p>

⁶ Transport for London. (2018). Healthy Streets Check for Designers. Retrieved from, <https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets>

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	<p>We recognise that the application of the Healthy Streets Approach to the design and management of street environments intends to make cycling and walking more attractive, safer and more accessible. However, considering the range of urban, sub-urban and semi-rural settings within Barnet, it is difficult to envisage how such an approach would work in practice across the whole Borough. As Barnet currently has fewer on-road cycle lanes, but a good number of routes available to cyclists through parks and signed links on quieter roads, the final London Plan should consider in greater detail the potential of green and open spaces to help deliver attractive and accessible cycle routes, in addition to town centres and residential streets. Barnet would also benefit from hearing further detail in the final Plan about what cycle improvements are to be expected on TfL roads.</p> <p>The draft MTS proposes (Proposal 3, p. 51) the expansion and improvement of cycle networks in London so that 70% of Londoners will live within 400 metres of a high-quality and safe cycle route by 2041. However, the proposed new cycle routes (p. 53) partially reinforce the current radial bias of London’s transport system, despite it being well-recognised that London lacks good orbital routes that offer an alternative to car travel. This is most certainly the case in Barnet. It is of greater benefit to Barnet if the future cycle network in 2041 covers far more of Outer London and introduces more orbital routes. Otherwise trips by car will remain the primary mode of transport for journeys between Barnet’s town centres, and the Borough will struggle to best contribute to overall car reduction targets.</p> <p>The draft MTS also proposes (Proposal 6, p. 57) to increase the use of TfL’s Cycle Hire Scheme as well as future models of cycle hire (dockless bikes etc.). So far, such schemes have largely benefited inner and central boroughs, and are yet to expand to or see widespread adoption in Barnet. Barnet would welcome a commitment to extend TfL’s cycle hire into the southern parts of the Borough, including Childs Hill and Golders Green.</p>								
<p><i>T6.1, Residential Car Parking Standards</i></p>	<p>Continued car use in the lower density suburbs of Outer London remains a reality, irrespective of public transport service and reliability improvements. Barnet’s Local Plan includes a local approach to parking marginally less restrictive than the London Plan for residential development. We recognise that there is some provision for flexibility within this framework to take account of local variations and the way these are applied across different tenures.</p> <p>The DLP residential car parking standards are based predominantly on PTAL and do not take into account unit sizes. The following table compares Barnet maximum residential parking standards (DM17) and DLP maximums.</p> <p>LBB/LPD Maximum Standards comparison</p> <table border="1" data-bbox="712 1238 1496 1281"> <thead> <tr> <th data-bbox="712 1238 898 1281">Bedrooms/</th> <th data-bbox="898 1238 1095 1281">LONDON</th> <th data-bbox="1095 1238 1294 1281">DM17</th> <th data-bbox="1294 1238 1496 1281">PTAL</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Bedrooms/	LONDON	DM17	PTAL				
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	Household	PLAN DRAFT DEC 2017 Maximums	Maximum Parking Spaces per Unit	
	1*	0.75-1.5	Less than 1	1-3
		0.5-Car free		4-5
	2	0.75-1.5	1 to 1.5	1-3
		0.5-Car Free		4-5
	3	0.75-1.5	1 to 1.5	1-3
		0.5-Car free		4-5
	4+	0.75-1.5	1.5 to 2	1-3
		0.5-Car free		4-5
<p><i>*where small units (generally studios and one bedroom flats) make up a proportion of a development, parking provision should reflect the resultant reduction in demand so that provision across the site is less than 1.5 spaces per unit.</i></p> <p>Whilst based on a significant evidence base published along with the DLP, there is an explicit PTAL based approach to the specified maximum standards; however, the evidence suggests that accessibility and journey time to regional centres from areas of low PTAL is much more nuanced and that a purely PTAL based approach has some limitations. Barnet considers that there should be some provision for flexibility within this framework to take into account local variations and therefore scope to allow the Council the opportunity to set different standards based on demand and public transport accessibility that more accurately reflect social, environmental, strategic, and policy changes since 2011.</p> <p>Car free development can only be fully enforced in areas covered by Controlled Parking Zones (CPZs). Without a CPZ there is no mechanism to control car ownership, allowing future residents to park on the surrounding highway network. Many of the Borough’s CPZs were designed to stop commuters rather than deter people from owning cars.</p> <p>To promote car free development the majority of CPZs in the Borough will need to be altered to provide a deterrent to car ownership.</p> <p>“The maximum car parking standards set out in Policy T6.1 Residential parking to Policy T6.5 Non-residential disabled persons parking should be applied to development proposals and used to set local standards within Development Plans.”</p> <p>Reductions in car parking provision will be enforceable in sections of the Borough covered by day long CPZs, however this only includes a small number within Barnet. The possible impact of overspill parking from new development will also</p>				

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	<p>need to be considered. On smaller schemes officers are under pressure to ensure the maximum parking quantum possible is provided given there are on-street parking issues within the Borough which are communicated via residential objections. Larger Major and Strategic planning applications have the ability to promote new CPZs or reviews and extensions to existing. While the planning process can promote these forms of mitigation their implementation is subject to public consultation. As residents can veto the CPZ proposals, this form of mitigation cannot be guaranteed.</p> <p>The current London Plan states, “in Outer London areas with low PTAL (generally PTALs 0-1), boroughs should consider higher levels of provision, especially to address ‘overspill’ parking pressures.” This gives the ability to request car parking levels which fully mitigate against overspill parking. Given that areas of high PTAL value are more likely to be high density with smaller units, the proposed standards should provide the required flexibility, while allowing the Council the opportunity to set different standards based on demand and public transport accessibility that more accurately reflect social, environmental, strategic, and policy changes since 2011. We note however that this level of flexibility is being withdrawn from the new DLP proposals and that the impact of parking stress is not addressed or even mentioned. Barnet considers that the final London Plan must give serious consideration to allowing as a minimum the application of local car parking standards for outer Borough locations with PTAL levels of 0-2. Recent work undertaken by the Borough indicates that there is a considerable mismatch in PTAL level depending on whether a predominantly radial or orbital approach is taken to determining accessibility. Locations in the south of the Borough may suffer from poor orbital connections, whereas others on the periphery may have particularly poor radial connections. Where a site has either a radial or orbital PTAL of less than 2 a locally bespoke approach to requirements should be considered and reflected in the application of the London Plan parking standards as a one size-fits-all approach will therefore be very difficult to achieve. There is also a need for the London Plan to be more sensitive in terms of visitors parking, particularly with regard to vulnerable residents living in new parking restricted development.</p> <p>We also strongly support the provision of car-clubs as a key mitigation component and will seek to maximise developer contributions in this area.</p>
<p><i>T6 Car parking</i> <i>T6.2 Office Parking</i> <i>T6.3 Retail Parking</i> <i>T6.4 Hotel and leisure uses parking</i> <i>T6.5 Non-residential disabled persons parking.</i></p>	<p>These policies stipulate: new housing and office developments that are in areas well connected by public transport are expected to be car-free, and that Outer London maximum parking standards are set for offices and retail developments (numbers of spaces based on quantum of floorspace). The definition of well-connected areas includes Major Town Centres (i.e. Edgware) and all areas with a PTAL score of 5-6 with the level of parking required determined by the location of the development and its PTAL score.</p> <p>Barnet currently accepts London Plan standards on non-residential developments. As we move forwards with our new Local Plan we will examine the impact of proposed new residential and non-residential parking standards in the DLP and justify a policy framework that better responds to local circumstances.</p>
<p><i>T7 Freight and Servicing</i></p>	<p>This policy seeks to facilitate sustainable freight movement in London through consolidation, modal shift and promoting</p>

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	<p>deliveries at different times of day and night so as to reduce the impact on road congestion and air quality and conflict with other uses. Given the continued growth of freight and home deliveries, in developing transport policies and priorities for Outer London consideration of safety and residents privacy is required as is an understanding of necessary outcomes to ensure efficient and appropriate use of the road network alongside any behaviour and policy changes..</p> <p>Barnet supports the DLP aspirations in terms of freight and servicing and has already taken active measures to coordinate the provision of facilities to reduce trips and meet emissions standards. Having researched the wide range of freight consolidation experience and information in both general and specific terms, Barnet has chosen to participate in the Camden FCC for a trial one-year period. This will provide critical information and statistics about deliveries to Barnet Council and its partner organisations. Funding will come from the Mayor’s Air Quality Fund.</p> <p>Overall there does remain a question, however, around whether the working model being proposed by Camden in partnership with logistics providers DHL will by itself achieve measurable reductions in either freight mileage or emissions solely through product delivery consolidation alone.</p> <p>It is also evident that much further work is needed to ensure that mode shift targets in relation to freight can be achieved given the lack of control over routeing and key stakeholders.</p>
<i>T8 Aviation</i>	<p>The Council is not currently actively engaged in the Heathrow expansion/development debate. The two airports that have the biggest impact on the Borough are Luton and Heathrow; however the need to consider expansion in the context of the wider South East region is recognised. Although the Mayor has made clear that he supports the expansion of Gatwick, ultimately the final decision rests outside his remit.</p> <p>Barnet will support reasonable proposals for airport expansion that suitably mitigate against adverse environmental, social and surface access impacts and address the future needs of London.</p>
<i>T9 Funding transport infrastructure through planning</i>	<p>Barnet supports Policy T9 that the Mayor will make use of Mayoral Community Infrastructure Levy (MCIL) resources to secure funding towards major strategic infrastructure. In line with policy T9 WLA boroughs have jointly developed shared strategic infrastructure priorities, particularly the West London Orbital Line referred to in both the DLP (p.47) and the MTS.</p> <p>We welcome the policy commitment to require provision of improved infrastructure through planning for strategic borough infrastructure as well as TfL infrastructure and will work with the Mayor to identify suitable opportunities. However, this will have implications for workloads/resources. We would urge TfL and the GLA to engage with borough officers at an early stage in highlighting funding streams and future opportunity areas to ensure this level of funding is captured at the earliest stage possible and with a minimal loss in funding opportunity.</p> <p>For many years the “sub-regional boundaries” used by the GLA and TfL to plan their work have been inconsistent with the way that local authorities in West London actually work. Specifically, we consider that the Barnet should be</p>

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	<p>considered by the GLA as a part of the “West” GLA sub-region. This small change would cost nothing to implement and is currently an active barrier to more effective and efficient joint working between boroughs with an established track record of doing so.</p> <p>The aspirations in the London Plan to increase sustainable travel to a mode share of 80% present significant challenges for Outer London. Radical rethinking is required on how people travel, especially in low density, low PTAL areas as well as those that have poor cycling and walking infrastructure.</p> <p>We believe that the Plan should have a commitment to do more on education, publicity and promotion of healthy travelling options in Outer London. A campaign along similar lines as those undertaken prior to the London Olympics (such as the Travel Advice to Business Programme) would provide substantial benefits in terms of informing the general public and local Members about the options available and the aims of the London Plan.</p>
<i>M1 Monitoring</i>	<p>We support the inclusion of a measurable KPI for health. This is the first London Plan to do so and demonstrates a shift in the way we think about health, planning and the built environment.</p>