

Examination of the Barnet Local Plan

Appendix to Inspectors' letter of 17 August 2023

Summary of Main Modifications requested to the Plan as submitted

Introduction to the Plan (including Figure 1)

1. A Main Modification (MM) is required to Figure 1 to update the Plan to ensure it is effective in setting out the Supplementary Planning Documents (SPDs) that have been adopted and that are to be prepared in a manner consistent with the Council's Local Development Scheme (LDS) published in September 2021.
2. The Plan as submitted would not provide a full 15-year period from the date of adoption. A MM is, therefore, required to provide a firm commitment that the Council will undertake an early review of the Plan with the timetable for the preparation of its replacement, together with any SPDs identified in the Plan and new Area Action Plan Development Plan Documents (DPDs), to be set out within a new LDS (or alternative document of equivalent status) within a year of its adoption.
3. A MM is required to Section 1.3 of the Plan as submitted to refer to the most up-to-date published version of the National Planning Policy Framework (the Framework) and its relevant paragraphs where necessary, to ensure consistency with national policy. Similar changes are required elsewhere throughout the supporting text of the Plan and such changes should be included and consolidated within a single MM if otherwise unrelated to those set out in this Appendix.

Vision and Relationship of Local Plan Key Objectives to Policies (including Table 2)

4. Table 2 identifies the most relevant Local Plan policies relative to the key objectives and requires a MM in the interest of the effectiveness of the Plan to ensure that the listed policies are comprehensive and consistent with the subsequent MM to Table 3.
5. A MM is also required to the supporting text to provide the necessary context to the key objective seeking to deliver an environmentally sustainable Borough and resilience to climate change, following the Council declaration of a Climate Emergency. It should also clarify the approach taken to flood risk as supported by evidence.

Strategic and Non-Strategic Policies (including Table 3)

6. A MM is required to Table 3 to identify Policies CDH01, CDH02, CDH03, CDH04, TOW01, TOW04, CHW01, ECC02, TRC01, TRC02 and TRC03 as strategic policies rather than non-strategic policies.

Policy BSS01 - Spatial Strategy for Barnet

7. Policy BSS01 requires a MM for soundness and general conformity with the London Plan which should include the following changes:
 - Policy BSS01 a) ii) and any related supporting text: clarification of the approach to a new mixed use Metropolitan Town Centre in Brent Cross Growth Area with up to 115,000 sq.m of new retail floorspace and up to 395,297 sq.m of new office space based on the existing planning permission.
 - Policy BSS01 a) iii) and any related supporting text: clarification of the requirement range of between 67,000 sq.m and 106,000 sq.m of new office space in the rest of the Borough with the aim to distribute amongst Barnet's town centres. Associated updates are required to Table 24 of the Plan to provide appropriate monitoring indicators and triggers for action.
 - Policy BSS01 a) - new sub-criteria and supporting text: clarification of the strategic approach to industrial land focussing on intensification rather than new additional development, and also linking to Policy ECY01; together with clarification of the approach to safeguarding of Locally Significant Industrial Sites (LSIS) and the parameters which will guide proposals for new industrial development. (see also covering letter RE: explanation of approach of not taking forward evidence of requirements for additional industrial land).
 - Policy BSS01 a) - new sub-criteria and supporting text: to clarify the intended approach of not setting a specific requirement for new retail or leisure development in the Plan (see also covering letter RE: strategic approach to main town centre uses).
 - Policy BSS01 b) - changes are required to the strategic approach to climate change linking to Policy ECC01 to ensure consistency with the national policy approach of mitigating and adapting to climate change as set out in the Framework.
 - Policy BSS01 c) - changes are required as identified in EXAM4 to clarify the terminology relating to Growth Areas and Opportunity Areas, and to specifically refer to New Southgate Opportunity Area given it is not otherwise covered by Policies GSS01 to GSS13. A further change is required to provide certainty of how a decision maker should react to development proposals in other locations where growth is intended to be supported where there is, amongst other things, 'capacity'.
8. A consequential change as part of the MM to Policy BSS01 is also required to provide the necessary clarification in the supporting text of the Plan of the relationship between and identification of Opportunity Areas and Growth Areas in paragraphs 1.3.3 and 3.4.2 respectively. This should include a further

explanation of the differentiation of approach taken with respect to the New Southgate Opportunity Area in terms of its boundaries yet to be defined on Map 2 - Key Diagram and how it may be provided in the future (for example, through an early review of the Plan or the preparation of an Area Action Plan DPD within a defined time period).

Key Diagram (Map 2)

9. The MM for soundness should include the following changes:

- To clearly define the Opportunity Area boundaries at Brent Cross-Cricklewood and Colindale.
- To differentiate the New Southgate Opportunity Area as a broad location for development / growth and revise its boundary to remove any land that falls outside of the London Borough of Barnet boundary.
- To revise the boundaries of the Edgware Growth Area, Burnt Oak District Town Centre and Colindale/The Hyde District Town Centre to remove any land that falls outside of the London Borough of Barnet boundary.
- To differentiate the Mill Hill East Area to clarify that the bespoke approach in Policy GSS07 does not propose to define it as a Growth Area, when taking account of the presence of Green Belt and the Mill Hill Conservation Area within its boundary.
- To add the designation of the Metropolitan Town Centre at Brent Cross.
- To identify the A406 North Circular, A1 Great North Way / Watford Way, and A41 Edgware Way / Watford Way / Hendon Way to reflect their status in Policy GSS11.
- Any other necessary changes arising from any revisions to the boundaries of Growth Areas in EXAM29A, EXAM30, EXAM31 and EXAM33.

Barnet's Housing Requirement (including Table 4)

10. A MM for soundness and general conformity with the London Plan should include the following changes:

- Significant amendments to supporting text between paragraphs 4.4.1 to 4.4.5, together with the associated key objective in paragraph 3.2.2 to ensure that the role of the Plan is unambiguous insofar as Policy H1 and Table 4.1 of the London Plan set the ten-year housing target (2019/20 to 2028/29), and that it is applied and taken forward when identifying the minimum of 35,460 new homes required for the 2021 to 2036 Plan period.
- Amendments to Table 4. This should include removal the calculations and references to the MHCLG Standard Methodology (December 2020), Barnet Strategic Housing Market Assessment (October 2018) for the 2021 to 2036 period and the Draft London Plan (December 2017).

Barnet's Housing Land Supply calculations and the Housing Trajectory (including Tables 5 and 5A, Figure 3 and addition of new Table 5B)

11. A MM for soundness and general conformity with the London Plan should include the following changes:
 - Updates to Table 5 and Table 5A and the housing trajectory in Figure 3 to reflect the most up-to-date supply calculations taking account of the implications of other MMs recommended in this Appendix.
 - Consequential changes throughout the Plan to any related housing supply figures.
 - A new Table 5B to demonstrate the contribution of proposed allocations in the Plan (and any contribution from the brownfield register as appropriate) to small sites (less than 0.25 hectares) as referred to in Policy H2 of the London Plan. The new Table 5B should also demonstrate that identification of small and medium sized sites is consistent with the Framework requirement for at least 10% of sites on no larger than one hectare.

Policy GSS01 - Delivering Sustainable Growth

12. A MM for soundness and general conformity with the London Plan should include the following changes:
 - Policy GSS01 (1st paragraph) and any related supporting text: clarification of the requirement for sufficient provision of infrastructure and community facilities that accords with paragraph 20 of the Framework.
 - Policy GSS01 (2nd and 3rd paragraphs) and any related supporting text: identification of the range of between 12,000 and 27,000 new jobs to be provided across the Borough in the Plan period, together with associated changes to paragraph 4.5.1. In addition, refinement of the approach to employment growth between 2021 and 2036 is necessary to provide certainty of the distribution of retail, office, other main town centre uses and employment floorspace expected to come forward within the Brent Cross Growth Area as part of the new Metropolitan Town Centre, together with the suitability of those forms of development and the distribution (where possible to quantify) to other locations identified in Policy BSS01 including Barnet's Major and District Town Centres.
 - Policy GSS01 (4th paragraph) and any related supporting text: clarification of the specific major new public transport infrastructure to be delivered during the Plan period taking account of the most up-to-date evidence of feasibility and delivery timescales for the West London Orbital (WLO) rail line and the potential for Crossrail 2, together with any necessary safeguarding requirements thereto.
 - Policy GSS01 (4th paragraph, criterion a) - Growth Areas) and any related supporting text: correction of terminology for Growth Areas and updates to new homes figures to ensure consistency with MMs to Table 5 and Policies GSS02 to GSS06; removal of Growth Areas windfalls to prevent double counting, together with removal of Mill Hill East to a sub-category as it is

not identified as a Growth Area in Policy GSS07 and similar updates to its new homes figure.

- Policy GSS01 (4th paragraph, criteria b) to f) and any related supporting text: any necessary updates to new homes figures to ensure consistency with MMs to Table 5 and Policies GSS08 to GSS12. This should include removal of windfall allowances for District Town Centres to prevent double counting; reduction of new homes for Existing Public Transport Nodes to reflect only the indicative capacities of the relevant sites in Annex 1, and removal of the figure for the WLO to accord with the MM suggested to Policy GSS09 later in this letter.
 - Policy GSS01 (5th paragraph) and any related supporting text: amendments to the approach to small sites (0.25 ha and below) to indicate a range with the 5,100 homes figure based on historic trends in Barnet for developments of under 10 units as the minimum anticipated to be delivered, and that an upper target of 6,510 homes is sought to ensure general conformity with Policy H2 of the London Plan. Associated amendments are required to Table 4.2 and paragraphs 4.1.11, 4.2.3 and 4.8.4. Further changes in that respect should require small sites to have good access to public transport and local services, and also ensure that the role of the SPD to be prepared is consistent with the Framework insofar as adding further detail to the policy and providing a design code for small site development.
 - Policy GSS01 (7th paragraph) and any related supporting text: the wording seeking to define the requirement in terms of 'optimising site capacity' should be modified to ensure flexibility to accommodate requirements of other policies of the Plan and material considerations beyond 'the most appropriate form and land use for the site'.
 - Policy GSS01 (new paragraph with associated supporting text): new policy wording to provide supportive approach for Build to Rent developments linking to the approach set out in Policy H11 of the London Plan.
 - Policy GSS01 (new paragraph with associated supporting text): additional wording should be added to provide a positive and supportive approach to proposals for self-build and custom housebuilding that makes efficient use of land to meet identified demand, and to encourage neighbourhood plans in locations where there is evidence of unmet demand to identify sites suitable for self and custom housebuilding. This should make clear that small sites (below 0.25 hectares in size) as set out in Policy H2 of the London Plan, including those proposed to be allocated in the Plan, are locations where self-build and custom housebuilding will be supported and encouraged. Associated updates are required to Table 24 of the Plan to provide appropriate monitoring indicators of delivery of self-build and custom housebuilding and triggers for action if necessary to support the Council in meeting its duties under sections 2 and 2A of the Self Build and Custom Housebuilding Act 2015 to have regard to and give enough suitable development permissions to meet the identified demand.
13. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This should also include clarification in the supporting text that the Plan has applied a sequential, risk-based approach to the location of

development, to the spatial strategy and the site allocations in accordance with national policy, including taking account of all sources of flood risk and the current and future impacts of climate change.

Policy GSS02 - Brent Cross Growth Area (including Map 3)

14. A MM for soundness and general conformity with the London Plan should include the following changes:

- Policy GSS02 (1st paragraph): clarification of the range of uses that will be supported in the new Metropolitan Town Centre, together with the addition of expressed support for development proposals contributing to the comprehensive regeneration of the Brent Cross Growth Area where they would bring forward opportunities that optimise the use of land and site capacity via a design-led approach (linking to Policy D3 of the London Plan).
- Policy GSS02 (2nd paragraph): re-wording of the first sentence to be clear that the sub-bullets apply only insofar as relevant, to ensure that it is evident how a decision maker should react to development proposals.
- Policy GSS02 (2nd paragraph, 3rd bullet): reduce the provision to a minimum of 7,500 new homes to reflect the Council letter of 28 July 2023 (including associated updates to Table 5), and also clarify the requirement for a design-led approach to support any uplift and provide expressed support for Build to Rent as part of the mix of tenures and types of housing.
- Policy GSS02 (2nd paragraph, 8th bullet): to ensure accordance with paragraphs 56 and 57 of the Framework, clarification that developments are also required to contribute to the restoration and enhancement of the River Brent and its corridor, alongside providing connections between the West Harp (Brent Reservoir) and West Hendon Playing Fields.
- Policy GSS02 (2nd paragraph, 9th bullet): delete the requirement to deliver a new waste management facility to replace the existing Hendon Waste Transfer Station as the intended location now alternatively falls within the boundary of the Brent Cross West (Staples Corner) Growth Area.
- Policy GSS02 (2nd paragraph, 10th bullet): remove as a sub-criteria of second paragraph and re-provide as a standalone Council approach to the consideration of meanwhile uses. Re-wording is required to clarify that the Council will support such proposals through the grant of planning permissions for temporary periods where they would assist comprehensive development of the area and/or do not impede the implementation of longer-term comprehensive regeneration of the sites.
- Policy GSS02 (4th paragraph): suitable re-wording to clarify the new commercial uses to be focussed around the new Brent Cross West rail station and specify the expected quantum of 395,297 sq.m of office development intended to provide over 20,000 new jobs to ensure alignment with the outline planning permission granted in 2014 as necessary for the comprehensive redevelopment of the Brent Cross Growth Area.
- Policy GSS02 (5th paragraph): re-wording of the approach to the Brent Cross Shopping Centre to reflect the changes to the Use Classes Order for main town centre uses and clarify its integration with the new Metropolitan

Town Centre with associated support for leisure, other main town centre uses (including those contributing to the night-time economy) and a mix of residential homes. Further changes are also necessary to differentiate Brent Cross North and provide certainty of the requirements for development proposals to enhance connections over the North Circular Road and increase access by modes of transport other than the private car.

- Policy GSS02 (6th paragraph): re-wording to be clear that the transport improvements in the sub-bullets are to be brought forward either in accordance with the outline permission, or through future permissions, planning conditions or planning obligations as necessary.
- Policy GSS02 (6th paragraph, 1st bullet to 3rd bullet): re-wording to clarify the requirements for pedestrian and cycle routes; accessibility and step-free access expectations at Brent Cross Underground and Brent Cross West stations for disabled persons; and the new rail station (Brent Cross West) on the Thameslink line supported by a public transport interchange.
- Policy GSS02 (6th paragraph, 4th bullet): clarification of requirements for a replacement or remodelled and improved bus station north of the North Circular Road as part of the expansion of Brent Cross Shopping Centre, with associated improvements to local bus infrastructure.
- Policy GSS02 (6th paragraph, 6th bullet): clarification that enhanced and multi-modal transport links to and within the development are sought, including at least one link across the North Circular Road and at least one crossing over the railway to Edgware Road.
- Policy GSS02 (6th paragraph, 9th bullet): deletion of the requirement for a new rail freight facility to replace the existing Strategic Rail Freight Site, to reflect evidence in EXAM9 that the Council is alternatively delivering rail freight facilities along with replacement rail sidings as part of the new station development at Brent Cross West (Thameslink).
- Policy GSS02 (7th paragraph): comprehensive re-wording to ensure that requirements for development proposals to contribute to infrastructure funding in the Brent Cross Growth Area accord with paragraphs 55 to 57 of the Framework and the Community Infrastructure Levy (CIL) Regulations.
- Policy GSS09 (8th paragraph): re-wording to provide an effective manner to monitor progress on the comprehensive regeneration of the Brent Cross Growth Area with appropriate milestones for delivery and triggers for action. This should include a commitment to an early review of the Local Plan if necessary and/or preparation of a SPD as appropriate.
- Policy GSS09 (9th paragraph): re-wording to clarify that Brent Cross North and Brent Cross Town Centre remain in different and multiple land ownerships and therefore, that development within the Growth Area will be expected to be co-ordinated to ensure that the development of one area does not unnecessarily delay nor fetter another.

15. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to Table 5 and paragraphs 1.3.3, 2.5.1, 3.4.2, 4.5.2, 4.5.5, 4.6.2, 4.8.2, 4.9.2, 4.9.3, 4.9.4, 4.10.2, 4.10.3, 4.10.4, 4.11.1, 4.12.1, 4.12.4, 4.14.6, 4.14.8, 4.15.1

4.15.2, 4.15.3 and 4.15.4. The MM should also include changes to Map 3 to specifically focus upon and accurately identify the boundaries of Brent Cross Town, Brent Cross North and Brent Cross (Thameslink) as distinct elements of the Brent Cross Growth Area.

Policy GSS03 - Brent Cross West Growth Area (including Map 3A)

16. A MM for soundness and general conformity with the London Plan should include the following changes:
 - Policy GSS03 (policy title and 1st paragraph): appropriate re-wording to Brent Cross West (Staples Corner) Growth Area to reflect the location of the regeneration opportunity and provide appropriate differentiation from the adjacent new Brent Cross West (Thameslink) station.
 - Policy GSS03 (3rd paragraph): re-wording is required to provide certainty that any detailed planning framework for the area to be brought forward as an SPD, including through any necessary joint working with the London Borough of Brent, would only add further detail to the policies in the development plan and guidance for development on specific sites, or on particular issues such as design.
 - Policy GSS03 (new paragraph to be inserted after 3rd paragraph): addition of requirement to deliver a new waste management facility to replace the existing Hendon Waste Transfer Station as the intended location now falls within the boundary of the Brent Cross West (Staples Corner) Growth Area and therefore, the requirement is to be relocated from Policy GSS02 as submitted.
 - Policy GSS03 (4th paragraph, 1st bullet): re-wording to clarify that the Council is seeking 'approximately' 1,800 new homes in accordance with a design-led approach (linking to Policy D3 of the London Plan), with the potential for further increases dependent upon delivery of the WLO.
 - Policy GSS03 (5th paragraph): re-wording to clarify support for development proposals that facilitate access to and delivery of the WLO, and to provide certainty that contributions in accordance with paragraphs 55 to 57 of the Framework and the CIL Regulations may be sought from developments in the area towards delivery of the WLO.
 - Policy GSS03 (6th paragraph): amendments to wording to provide necessary clarification that development proposals will be required to deliver or contribute to the listed infrastructure requirements in the sub-bullets, and also to make clear that the requirements would be secured either as part of the design of the development, planning conditions and/or planning obligations as appropriate.
17. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to paragraphs 4.16, 4.16.1, 4.16.2, 4.16.4, 4.16.5, 4.16.6 and 4.16.8. The MM should also include changes to Map 3A to identify the boundaries of the Brent Cross West (Staples Corner) Growth Area, ensuring consistency with and

removing any overlaps of the boundary of the Brent Cross Growth Area, and it should also provide certainty of the location of the Borough boundary.

Policy GSS04 - Cricklewood Growth Area (including Map 3B)

18. A MM for soundness and general conformity with the London Plan should include the following changes:
- Policy GSS04 (1st paragraph, 3rd sentence): remove requirements for developments in this specific location to align with a Covid-19 Recovery Programme.¹
 - Policy GSS04 (1st paragraph, 4th sentence): clarification is required that the Council will support proposals that optimise residential density on suitable sites in accordance with the design-led approach of Policy D3 of the London Plan.
 - Policy GSS04 (2nd paragraph, 1st bullet): re-wording to clarify that the Council is seeking ‘approximately’ 750 new homes with any uplifts required to be justified as part of the design-led approach to development. This is necessary to reflect the MMs to the indicative capacities of Site Nos. 7 and 8, and to remove windfall expectations given the constrained capacity beyond planning permissions and proposed allocations.
 - Policy GSS04 (2nd paragraph, 3rd bullet): clarification of support for proposals that address location-based requirements for appropriate floorspace for community, retail, other main town centre uses, including offices, that are proportionate to supporting the proposed housing growth and the viability and vitality of Cricklewood District Town Centre.
 - Policy GSS04 (3rd paragraph): re-wording to clarify the requirement for contributions in accordance with paragraphs 55 to 57 of the Framework and the CIL Regulations towards new/improved active travel routes to Cricklewood station, as well as an improved interchange, onward travel facilities and public realm at that location.
 - Policy GSS04 (4th paragraph): re-wording is required to provide certainty that any detailed planning framework for the area to be brought forward as an SPD, including through any necessary joint working, would only add further detail to the policies in the development plan and guidance for development on specific sites, or on particular issues such as design.
19. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to Table 5 and paragraphs 4.17.3, 4.17.4 and 4.17.6. The MM should also include changes to Map 3B to provide an accurate relationship of Cricklewood Growth Area with the Railway Terraces Conservation Area, to remove allotments from the Growth Area boundary and to provide certainty of the location of the Borough boundary.

¹ Similar changes should also be included where relevant in MMs to other policies of the Plan.

Policy GSS05 - Edgware Growth Area (including Map 3C)

20. A MM for soundness and general conformity with the London Plan should include the following changes:
- Policy GSS05 (3rd paragraph): re-wording to clarify that the Council will support proposals that optimise residential density on suitable sites in accordance with the design-led approach of Policy D3 of the London Plan.
 - Policy GSS05 (4th paragraph, 1st bullet): re-wording to clarify that the Council is seeking 'approximately' 4,860 new homes with any proposals to be subject of the design-led approach to development. This is necessary to reflect the indicative capacities of the proposed site allocations, and to remove windfall expectations given the constrained capacity beyond planning permissions and proposed allocations.
 - Policy GSS05 (4th paragraph, 3rd bullet): to ensure consistency with Policy TOW01, clarification is required of the support for proposals that consolidate retail floorspace whilst addressing qualitative requirements. The change should also provide support for appropriate floorspace for community and other main town centre uses, including offices, that are proportionate to supporting the proposed housing growth and the vitality of Edgware Major Town Centre.
 - Policy GSS05 (4th paragraph, new bullet after 3rd bullet): addition of a requirement that development ensures improved flood risk resilience for the Growth Area and surrounding communities with provision of flood risk infrastructure and restored rivers.
 - Policy GSS05 (4th paragraph, 5th bullet): additional clarification with respect to the requirements of the Strategic Transport Plan relating to maintaining the bus and tube operations associated with the existing rail and bus stations. In addition, clarification of the requirement to improve the experience of and linkages for pedestrians and cyclists, together with a new requirement to deliver improvements to the streets and public realm in line with the Healthy Streets Approach, including additional cycle parking in the town centre and at the stations.
21. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to Table 5, paragraph 4.18.12 and a new paragraph 4.18.9A to provide further detail on the necessity for improved flood risk management in Edgware. The MM should also include changes to Map 3C to provide certainty of the location of the Borough boundary and to revise the boundary of the Edgware Growth Area to remove any land that falls outside of the Borough boundary.

Policy GSS06 - Colindale Growth Area (including Map 3D)

22. A MM for soundness and general conformity with the London Plan should include the following changes:

- Policy GSS06 (1st paragraph): re-wording to clarify that the Council is seeking 'approximately' 4,570 new homes with any uplifts to be justified as part of the design-led approach to development in accordance with Policy D3 of the London Plan. This reflects the indicative capacities of the proposed site allocations and up-to-date evidence of expected delivery of planning permissions, including the Colindale Gardens development.
- Policy GSS06 (3rd paragraph, 1st bullet): clarification that the new Local Centre will also be suitable to accommodate location-based requirements for appropriate floorspace for community, retail and other main town centre uses, including offices, that are proportionate to supporting the housing growth and subject to no unacceptable impact upon the viability and vitality of nearby town centres.
- Policy GSS06 (3rd paragraph, 2nd bullet): amendment to provide certainty that the New Colindale Underground Station ticket hall building is required to have step-free access to the platforms and sufficient gate-capacity to accommodate the growing population of the area.
- Policy GSS06 (3rd paragraph, 3rd bullet): clarification that improvements are also required to the Silk Stream.
- Policy GSS06 (3rd paragraph, new bullet after 3rd bullet): addition of requirement that developments should provide strategic flood risk infrastructure and/or contribute to fluvial flood risk schemes and measures to alleviate surface water flooding as necessary to ensure the Growth Area's resilience to and mitigation of flood risk and climate change.
- Policy GSS06 (3rd paragraph, 8th bullet): amendment to include a requirement for proposals to minimise impacts on and/or provide net gains for biodiversity as part of the access improvements utilising land between the Northern Line and the Silk Stream.
- Policy GSS06 (4th paragraph, 1st bullet): re-wording to provide certainty that Colindale Underground Station will be reconstructed and upgraded to increase its capacity and provide step-free access to platforms, along with additional cycle parking and facilitating redevelopment of adjacent land.
- Policy GSS06 (4th paragraph, 2nd bullet): this bullet should either be deleted or re-worded to only cross-refer to the approach to the Grahame Park Estate otherwise provided by Policy GSS10.
- Policy GSS06 (4th paragraph, 4th bullet): addition of a requirement for biodiversity enhancement as part of residential-led development at the Public Health England site on the riverside adjacent to the Silk Stream.
- Policy GSS06 (new paragraph after 4th paragraph): addition of a supportive approach for redevelopment of other previously developed land in the Growth Area that has the potential to optimise the delivery of new homes and/or job opportunities in accordance with the design-led approach in Policy D3 of the London Plan.

23. The listed changes to the policy set out, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to Table 5, paragraphs 4.19.2, 4.19.3, 4.19.4, 4.19.8, 4.19.10 and a new paragraph 4.19.5A to provide further detail on the necessity for improved flood risk management in Colindale. The MM should also include changes to Map 3D to provide certainty of the location of the Borough boundary and to revise the boundary of the Colindale Growth Area to ensure consistency with boundaries of the Opportunity Area. This requires the addition of land around Woodcroft Park and surrounding streets to the north as previously included in the Opportunity Area boundary identified in the Colindale Area Action Plan (Core_Gen_11). Site No.9 (Colindeep Lane), should also be removed to ensure consistency with a MM required to delete that allocation.

Policy GSS07 - Mill Hill East (including Map 3E)

24. A MM for soundness and general conformity with the London Plan should include the following changes:
- Policy GSS07 (1st paragraph): the contextual information relating to Millbrook Park should be relocated to the supporting text and therefore, deleted from the policy.
 - Policy GSS07 (2nd paragraph): re-wording to clarify that the Council is seeking 'approximately' 1,700 new homes with any uplifts to be justified as part of a design-led approach to development in accordance with Policy D3 of the London Plan. This is necessary to reflect the indicative capacities of proposed site allocations and up-to-date evidence of expected delivery of planning permissions, including the Millbrook Park development.
 - Policy GSS07 (3rd paragraph): requires addition of clarification that the Transport Assessment must take account of cumulative impacts arising from other committed development (i.e. development that is consented or allocated and where there is a reasonable degree of certainty that it will proceed within the next three years).
 - Policy GSS07 (4th paragraph): significant re-wording to ensure that the requirements of development proposals with respect to Mill Hill Conservation Area and the Green Belt are consistent with national policy and/or cross refer to relevant policies in the Plan.
25. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to Table 5, paragraphs 4.20.3, 4.20.4 and 4.20.5. The MM should also include changes to Map 3E to revise the boundary of the Mill Hill East to ensure consistency with the boundary previously identified in the Mill Hill East Area Action Plan (Core_Gen_10).

Policy GSS08 - Barnet's District Town Centres

26. A MM for soundness should include the following changes:

- Policy GSS08 (1st, 2nd, 4th and 5th paragraphs): restructuring required to firstly set out the housing growth that will be supported in Barnet's District Town Centres in accordance with MMs to Table 5. Secondly it should identify the sub-categories of the Major Centre (Edgware) and the District Town Centres that are prioritised for investment and revitalisation (i.e. Main Town Centres) as referred to. Thirdly, it should be clear that District Town Centres are suitable locations to accommodate both mixed-use developments and provision of floorspace for community, retail and other main town centre uses including offices and leisure, subject to no unacceptable impact upon the viability and vitality of other town centres, and public realm and infrastructure improvements where necessary.
- Policy GSS08 (3rd paragraph): this is contextual information that should be supporting text and therefore, it should be removed from the policy and consolidated with the related paragraph 4.21.4.
- Policy GSS08 (6th paragraph): the initial sentence should be re-worded to ensure certainty that proposals for development will be supported provided that they meet the relevant sub-criteria and that there is due regard to Policy CDH03 with respect to public realm. Amendments are also required to sub-criteria d) to clarify that it is seeking to prevent negative impact on amenity; to sub-criteria f) to ensure suitable provision of community infrastructure in accordance with specified policies of the Plan; and to sub-criteria g) to cross-refer to the relevant car parking standards in Policy TRC03.
- Policy GSS08 (7th paragraph): changes are required to provide certainty that any detailed planning framework for the District Centres to be brought forward as an SPD, including through any necessary joint working, would only add further detail to the policies in the development plan and guidance for development on specific sites, or on particular issues such as design.

27. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to Table 5 and paragraphs 4.21.1 to 4.21.7.

Policy GSS09 - Existing and Major New Transport Infrastructure

28. A MM for soundness and general conformity with the London Plan should include the following changes:

- Policy GSS09 (1st paragraph, 1st bullet): an update is required to the capacity for housing growth to ensure consistency with the MM to Table 5, including removal of the indicative capacity for the WLO (see covering letter), and alteration to the indicative capacity at existing public transport hubs to ensure consistency with Annex 1 of the Plan.

- Policy GSS09 (1st paragraph 3rd bullet): re-wording to clarify suitability to accommodate mixed-use developments with location-based provision of floorspace for community, retail and other main town centre uses, including offices, proportionate to supporting housing growth and subject to no unacceptable impact upon the viability and vitality of town centres.
- Policy GSS09 (4th paragraph): removal of indicative capacity for 950 homes associated with the WLO.
- Policy GSS09 (5th paragraph): amendments to clarify the potential for at least 250 new homes to be provided in the New Southgate Opportunity Area during the Plan period as it is a broad location for growth and that any development would be subject to the design-led approach (in accordance with Policy D3 of the London Plan). Associated clarification is required to reflect the current status of Crossrail 2.
- Policy GSS09 (7th paragraph): changes are required to provide certainty for decision makers of 'high levels of PTAL' and whether the approach is intended to be consistent with Policy H1 of the London Plan.
- Policy GSS09 (8th paragraph): addition to the identified list of existing public transport hubs (not linked to a town centre) that are expected to support development should also include High Barnet, Woodside Park and Colindale to ensure a consistent approach with Annex 1 of the Plan and Policy GSS06. In contrast, the location of any intended housing growth at Hendon Station is not justified by sufficient evidence and therefore, it should be differentiated as a broad location for growth where any development would be subject to the design-led approach.
- Policy GSS09 (9th paragraph, 6th bullet): re-wording to ensure that the approach is consistent with the Plan and national policy in terms of conserving and enhancing the historic environment.
- Policy GSS09 (10th paragraph): amendments to ensure proposals for re-developments of car parks are cross-referred to the relevant Policy GSS12 and that the requirements are consistent with it.

29. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to Table 5 and paragraphs 4.22.1 to 4.24.7.

Policy GSS10 - Estate Renewal and Infill

30. A MM for soundness and general conformity with the London Plan should include the following changes:
- Policy GSS10 (1st paragraph): an update is required to the capacity for housing growth to ensure consistency with MMs to Table 5, this should be consistent with up-to-date evidence of existing regeneration programmes for the housing estates listed in the policy and avoid double counting if otherwise located in a Growth Area.
 - Policy GSS10 (3rd paragraph, 3rd bullet, and 5th paragraph): should be consolidated and amended to ensure that new affordable accommodation

is to be sought in accordance with the affordable housing tenures in the relevant policies of the London Plan.

- Policy GSS10 (6th paragraph, 4th bullet): re-wording to ensure consistency with Policy HOU02.
- Policy GSS10 (6th paragraph, 5th bullet): re-wording to cross-refer to the related requirements in Policy ECC04.
- Policy GSS10 (6th paragraph, 8th bullet): re-wording to cross-refer to the related car parking standards in Policy TRC03.

31. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to Table 5 and paragraphs 4.25.1 to 4.25.5.

Policy GSS11 - Major Thoroughfares

32. A MM for soundness and general conformity with the London Plan should include the following changes:

- Policy GSS11 (1st paragraph): an update is required to the capacity for housing growth to ensure consistency with MMs to Table 5, together with amendments to clearly define the major thoroughfares and ensure consistency with the key diagram, and to refer correctly to National Highways. In addition, the fourth and fifth sentences should be deleted to avoid inconsistencies with the policy's bullet pointed criteria. Furthermore, updates are necessary to clarify that the policy supports residential development, and mixed-use development that accords with the Plan's policies on town centres and the economy.
- Policy GSS11 (2nd paragraph, 1st bullet): clarify that improvements to accessibility may be necessary.
- Policy GSS11 (2nd paragraph, 3rd bullet): replacement of vague references to wall-like corridors of medium rise buildings with a criterion to require development to result in a sense of separation between town centres.
- Policy GSS11 (2nd paragraph, 4th bullet): separation of criteria relating to streetscapes and the Healthy Streets Approach for effectiveness, and also make clear that development proposals should deliver improvements that support the ten Healthy Streets Indicators.
- Policy GSS11 (2nd paragraph, 5th, 6th and 7th bullets): amendments so that the benchmark for assessing air quality is consistent with Policy ECC02, the approach to open spaces and play spaces aligns with Policy ECC04 and the approach to car parking is consistent with Policy TRC03.²
- Policy GSS11 (3rd and 4th paragraphs): delete so that approaches to tall buildings are dealt with comprehensively under Policy TRC04.
- Policy GSS11 (final paragraph): replace with supporting text that clarifies the relationship between the policy and the site allocations in Annex 1.

² Similar changes should also be included where relevant in MMs to other policies of the Plan.

- Policy GSS11 (new paragraph): clarify how the status of the A1, A41 and A406 differs from the five major thoroughfares to be identified (1st paragraph), and set out the criterion that will be considered in assessing development proposals along those routes.
33. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to clearly identify the aims of the policy and its application in respect of the Healthy Streets Approach. Additionally, there is a need to clarify the roles and status of current and proposed future SPDs, confirm that SPDs are guidance and, to avoid potential ambiguity for decision makers, make clear that the policy applies to sites adjacent to major thoroughfares.

Policy GSS12 - Redevelopment of Car Parks

34. A MM for soundness and general conformity with the London Plan should include the following changes:
- Policy GSS12 (1st paragraph): clarification that the policy is supportive of redevelopment of publicly accessible, surface level car parks for residential and main town centre uses (subject to compliance with other relevant policies).
 - Policy GSS12 (1st paragraph, 1st bullet): re-word so it is consistent with the terms of Policy CDH01.
 - Policy GSS12 (1st paragraph, 2nd bullet): delete the requirement for proposals to demonstrate how the use of public transport and active travel modes would lead to reduced car park usage because in effect this would involve a reappraisal of accessibility and thus undermine the PTAL methodology.
 - Policy GSS12 (1st paragraph, 3rd bullet): replace with a reference to Policy TRC03, which as modified would address the replacement and re-provision of car parking in detail.
 - Policy GSS12 (1st paragraph, 4th bullet): re-word approach to transport assessment so it is consistent with policies TRC01 and ECC02.
 - Policy GSS12 (2nd paragraph): amendments to make clear that parking statements should be provided to demonstrate the suitability and arrangements for any retained or proposed parking.
35. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to explain the relevance of Policy TRC03 to car park redevelopment proposals, and clarify that where relevant strategies should be submitted as part of proposals to demonstrate how any disruption to parking required for retention or re-provision will be minimised.

Policy GSS13 - Strategic Parks and Recreation

36. A MM for soundness and general conformity with the London Plan should include the following changes:
- Policy GSS13 (1st paragraph): include the provision of the three destination hubs for sport and recreation at Barnet and King George V Playing Fields, Copthall Playing Fields and Sunny Hill Park, and West Hendon Playing Fields within the Plan period.
 - Policy GSS13 (2nd paragraph): to align with Policy CHW01, clarify that Growth Areas, town centres and local centres are the preferred locations for new indoor facilities, unless they are specifically designed to improve the utilisation of an open space.
 - Policy GSS13 (3rd paragraph): clarify that the regional park is promoted in the Brent Valley and Barnet Plateau Green Grid Area.
37. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes at paragraph 4.28.3 to outline the relationship between policies GSS13, ECC04 and CHW01, which have overlapping considerations. The MM should also include a commitment to immediate preparation of up-to-date evidence relating to strategic parks and recreation, including the delivery of the regional park and the preparation of a new Parks and Open Spaces Strategy as set out in EXAM66, to inform the committed early review of the Plan.

Policy HOU01 - Affordable Housing

38. A MM for soundness and general conformity with the London Plan should include the following changes:
- Policy HOU01 (1st paragraph and 2nd paragraph): delete as submitted, and replace with new paragraphs which clarify that the Council is seeking to maximise delivery of affordable housing in accordance with Policies H4, H4A, H5 and DF1 of the London Plan.
 - Policy HOU01 (3rd paragraph): re-wording to specify accordance with the affordable housing tenures in Policy H6 of the London Plan.
 - Policy HOU01 (new paragraph after 3rd paragraph): addition to ensure that the approach to Build to Rent development and affordable housing is in accordance with Policy H11 of the London Plan.
 - Policy HOU01 (4th paragraph): re-wording of the related criteria c) and d) to clarify that the assessment of capacity of sites is on the basis of ensuring development is optimised, and to provide certainty that off-site provision or off-site contributions will be sought only in the circumstances set out in Policy H4 Part B of the London Plan.
 - Policy HOU01 (5th paragraph): delete the paragraph relating to Innovative Housing Products as a justified definition has not been provided. The policy should necessarily be re-focussed on optimising use of land and facilitating

delivery of housing to meet needs of each affordable housing tenure in accordance with the London Plan.

- Policy HOU01 (6th paragraph): amendments to clarify the replacement of existing affordable housing as part of proposals in housing estates falling under Policy GSS10.
- Policy HOU01 (7th paragraph): delete the paragraph relating to the Vacant Building Credit as there is no local evidence which justifies a departure from national policy in that respect.

39. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to paragraphs 5.4.1 to 5.4.14. The changes should also include any necessary additions in the MM to clarify the relationship with the London Plan and the approach to First Homes.

Policy HOU02 - Housing Mix (including Table 6 and Table 7)

40. A MM for soundness and general conformity with the London Plan should include the following changes:

- Policy HOU02 (1st paragraph): amendments to emphasise the requirement to deliver mixed and inclusive neighbourhoods, together with clarification that proposals will be supported where they provide a mix of dwelling types and sizes to help meet current and future housing needs.
- Policy HOU02 (2nd paragraph): delete to ensure consistency with the MM to Policy HOU03.
- Policy HOU02 (3rd paragraph): significant re-wording to reflect the purpose of Table 6 in setting out the Council's dwelling size priorities, and that all housing proposals are expected to reflect those priorities (including the proportion of family sized homes) unless it can be demonstrated that a variation to the preferred housing mix is justified on a site-specific basis in accordance with the criteria under the 6th paragraph.
- Policy HOU02 (4th paragraph): delete this paragraph relating to new assessments of housing need and rather include new evidence of housing need as a material consideration relevant under the 6th paragraph.
- Policy HOU02 (5th paragraph): delete this paragraph relating to the influence of the Annual Monitoring Report on the housing mix of proposals as such an approach is not appropriate nor justified.
- Policy HOU02 (6th paragraph): amendments to ensure an effective approach by adding site optimisation (taking account of Policies H1, H4, H5 and H10 of the London Plan) and the provision of Build to Rent and viability (in alignment with Policy DF1 of the London Plan), as further material considerations relevant to the application of the preferred housing mix and any variation thereto.
- Policy HOU02 (new paragraph after 6th paragraph): addition to clarify that flexibility for Specialist Housing schemes supported by Policy HOU04 will necessarily be applied.

- Policy HOU02 (7th paragraph): delete the paragraph relating to Innovative Housing Products as a justified definition has not been provided.
41. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to paragraphs 5.5 to 5.5.11. The changes should also include any necessary additions in the MM to clarify the approach to proposals for Build to Rent and Specialist Housing schemes, and deletion of paragraph 5.5.9 to reflect the expiry of an Article 4 direction. When taking account of the aforementioned changes, the further tenure breakdown for affordable housing tenures provided in Table 7 as submitted would serve little purpose and therefore, should also be deleted as part of the MM.

Policy HOU03 - Residential Conversions and Re-development of Larger Homes

42. A MM for soundness and general conformity with the London Plan should include the following changes:
- Policy HOU03 (1st paragraph): replace the first paragraph and criterion a) to provide an approach to residential conversions and re-development of larger homes that provides support for optimising the potential for housing delivery in locations specified in Policy H1 Part B 2) of the London Plan.
 - Policy HOU03 (1st paragraph, criterion b): taking account of the need for three-bedroom houses identified in Table 6 of the Plan, changes are required to specify that conversions should include at least one family sized home with three bedrooms capable of providing 4 bedspaces with direct access to a rear garden,
 - Policy HOU03 (1st paragraph, criterion c): changes are required to indicate that the gross internal floor area of the property should be not less than 135 sq.m at the time of the application where two self-contained residential dwellings are proposed (i.e. equivalent to a minimum of 1No. 3 bedroom 4 bedspace, and 1No. 2 bedroom 3 bedspace based on Table 9 of the Plan). At least 61 sq.m of gross internal floor space (i.e. the minimum for a family sized dwelling) should then be required for each additional dwelling proposed.
 - Policy HOU03 (1st paragraph, criterion d): so that it is evident how a decision maker should respond to development proposals, an amendment is required to clarify the circumstances where proposals will be supported relative to the surrounding character of the area and where there is no unacceptable impact on the amenity of occupiers of neighbouring properties of the area.
 - Policy HOU03 (1st paragraph, criterion f): re-wording is necessary to ensure consistency with Policy TRC03 by clarifying the required compliance with maximum car parking standards and minimum cycle parking requirements.
43. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to paragraphs 5.6.1 to 5.6.7. In that regard, it should be made clear that the

approach is necessary to prioritise the delivery of family homes from the existing housing stock in accordance with the Plan definition at paragraph 5.5.5 and to address the needs identified in Table 6.

Policy HOU04 - Specialist Housing (including Table 8)

44. A MM for soundness and general conformity with the London Plan should include the following changes:
- Policy HOU04 (part 1): amendment to the title to include older persons housing and re-structuring is required to provide a distinction between criterion b) relating to older persons housing when compared with wider housing choice for people with social care and health support needs.
 - Policy HOU04 (part 1, first paragraph): criterion b) relating to specialist older persons housing should be moved to its own paragraph at the start of Section 1 with cross reference to the associated requirements of specialist older persons housing set out in Policy H13 of the London Plan. Table 8 and any references thereto should be deleted as it is not consistent with the London Plan.
 - Policy HOU04 (part 1, first paragraph): re-wording required to express support for proposals for people with social care and health support needs, with associated changes to the wording of the remaining criteria to ensure effectiveness after relocation of criterion b).
 - Policy HOU04 (part 1, criterion d): re-wording to focus on PTAL3 or more as offering suitable locations that are well served by public transport and a specific requirement of being accessible to local shops, together with social infrastructure and health care to align with Policy H13 of the London Plan. (N.B. a 400m reasonable walking distance for extra care housing and older peoples housing to local parade of shops, local centre or town centre can continue to be referred to in paragraph 5.10.5 as an indicative guideline to assist applicants and decision makers).
 - Policy HOU04 (part 1, criterion f): subdivide the second sentence relating to remodelling of care homes into its own criterion in the interest of certainty that it is an individual requirement of proposals.
 - Policy HOU04 (part 2, criterion b): re-wording to clarify that proposals should demonstrate that they meet an identified need and avoid an over-concentration of Houses in Multiple Occupation (HMO) in the local area.
 - Policy HOU04 (part 2, criterion c): amendment required to clarify that protection of living conditions for residents and occupiers of neighbouring properties may be sought through a HMO management plan.
 - Policy HOU04 (part 2, new criterion e): to ensure consistency with the approach of Policy H9 of the London Plan and paragraph 5.12.5, a new criterion should be added to make clear that where an existing HMO is of a reasonable standard they will be protected unless it is demonstrated that there is an absence of need for HMO accommodation in the local area.
 - Policy HOU04 (part 3, criteria a and b): consolidate the requirements relating to public transport, cycling and walking to remove repetition and

- ensure accordance with the broader requirements of Policy H15 of the London Plan for purpose-built student accommodation.
- Policy HOU04 (part 4): re-wording is required to ensure that proposals for large-scale purpose-built shared living accommodation demonstrate how they meet an identified housing need in Barnet, provide a management plan to ensure no unacceptable impact on the living conditions of occupiers of neighbouring properties and also meet the requirements set out in Policy H16 of the London Plan.
 - Policy HOU04 (new final paragraph): an addition is required to provide certainty that all specialist housing proposals will be expected to achieve the highest standards of accessible and inclusive design in accordance with Policies D5 and D7 of the London Plan as appropriate.
45. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to paragraphs 5.8.1 to 5.14.3. The changes should include the proposed definition of an over-concentration of HMOs requiring new HMOs to generally be located 150m from an existing HMO, to ensure a complementary provision that would not undermine the separate approach of Policy HOU03 which otherwise prioritises meeting needs for family housing as part of residential conversions and re-development of larger homes. There are also necessary updates to the supporting text required following the adoption of the London Plan, this should include to paragraph 5.13.8 to reflect the changes to the contribution of net non-self-contained accommodation for students to meeting housing targets which should also be reflected in updates to Table 5. In addition, the supporting text should confirm that good accessibility via public transport for HMOs and Student Accommodation is considered to be PTAL3-6 to align with Policy H1 of the London Plan.

Policy HOU05 - Efficient Use of Barnet's Housing Stock

46. A MM for soundness and general conformity with the London Plan should include the following changes:
- Policy (part 1): re-wording is required to provide a positive approach setting out that development resulting in a net loss of residential accommodation will be supported in specific limited circumstances.
 - Policy HOU05 (part 1, criterion a): the approach to provision of local community facilities is too locationally restrictive and should be deleted, it should be replaced by expressed support for provision of social, physical or green infrastructure where local needs are clearly demonstrated. The requirement that the proposed use would not be detrimental to the amenity of existing residents should also be separated to its own criterion for effectiveness.
 - Policy HOU05 (part 1, criteria c and d): the respective approaches to Estate Renewal and Infill, and Growth Areas, Town Centres and Local Centres, seeking net replacement of residential units are redundant following the aforementioned changes and therefore, should be deleted.

- Policy HOU05 (part 2): delete this criterion as it is a statement of Council intent that should be in supporting text rather than the policy wording.
- Policy HOU05 (part 3): clarify that this relates specifically to 'short-stay holiday rental accommodation to be used for more than 90 days a year' to align with Policy H9 of the London Plan.
- Policy HOU05 (part 4): changes are required to the approach which encourages temporary (meanwhile) uses to ensure that they are supported subject to no unacceptable impact on the amenity of existing residents and that they would not prevent sites from being redeveloped in an efficient and timely manner.

47. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to paragraphs 5.15.1 to 5.15.5.

Policy HOU06 - Meeting Other Housing Needs

48. Policy HOU06 and its supporting text should be deleted. It is redundant following the MM to Policy GSS01 to necessarily include a policy approach to proposals for build to rent and self-build and custom housebuilding as part of the strategic approach to delivering sustainable growth.

Policy HOU07 - Gypsies, Travellers and Travelling Showpeople

49. A MM for soundness and general conformity with the London Plan should include the following changes:

- Policy HOU07 (1st paragraph): re-wording to clarify that the Council have identified no objectively assessed need for provision of pitches and plots for Gypsies and Travellers, and Travelling Showpeople households.
- Policy HOU07 (2nd paragraph): amendments to provide certainty that in the event that proposals for Gypsies and Travellers, and Travelling Showpeople accommodation do come forward that they will be supported provided that they meet the listed criteria.
- Policy HOU07 (2nd paragraph, criterion a): should be reworded to focus upon seeking effective use of previously developed land, together with safe access to the site with adequate space on site to allow for manoeuvring of vehicles.
- Policy HOU07 (2nd paragraph, criteria c and d): deletion of wording of requirements relating to the scale of the site being in keeping with local context and character and including landscaping and planting, to address impact on amenity and integration of the site with surroundings. It should be replaced with an approach to layout and landscaping that is consistent with national policy, including promoting opportunities for healthy lifestyles and assisting the integration of the site with surrounding communities.
- Policy HOU07 (2nd paragraph, criterion e): re-wording is required to ensure equivalent requirements to those that apply to other forms of development

elsewhere in the Plan in terms of avoiding unacceptable impacts on the character of the area and the amenity of occupiers and neighbouring residents (including in terms of noise and air quality).

- Policy HOU07 (2nd paragraph, criterion f): changes are required to ensure that the site has, or will be served by, a suitable supply of essential services including provision of mains gas and electricity, water, sewerage, drainage and for waste disposal.
- Policy HOU07 (2nd paragraph, criterion g): amendments to the approach to flood risk to ensure consistency with the relevant requirements of national policy (including paragraphs 159 to 168, footnotes 55 and 56, and Annex 3 of the Framework).

50. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes to paragraph 5.19.1 to align more closely with national policy in Planning Policy for Traveller Sites (PPTS), to clarify the approach to negotiated stopping as part of the management of unauthorised encampments, and a commitment that the preparation and publication of findings of a London-wide Gypsy and Traveller accommodation needs assessment, taking account of the 2021 Census, will inform the committed early review of the Plan.

Policy CDH01 - Promoting High Quality Design

51. A MM for soundness and general conformity with the London Plan should include the following changes:

- Policy CDH01 (part a): changes to more closely reflect Policies D3 and H2 of the London Plan in respect of the design-led approach to development.
- Policy CDH01 (part b): amendments to clarify the roles and status of current and proposed future SPDs and the Design Code for Small Sites, and confirm that SPDs are guidance.
- Policy CDH01 (sentence prior to criterion i.): for effectiveness, this should be labelled as part c) of the policy.
- Policy CDH01 (part c), criterion iv.): revisions to focus on provision of safe environments, including with respect to crime and disorder, fear of crime and fire safety, and addition of wording to clarify that proposals should seek to design out crime have regard to Secured by Design principles. Similar consequential changes should be made to supporting text in the Plan.
- Policy CDH01 (part c), criterion v.): delete reference to 'national residential space standards' to avoid referring to standards other than those set out by Table 9 and Policy D6 of the London Plan.
- Policy CDH01 (part c), criterion vi.): re-wording to clarify that development may affect the amenity of occupiers of property beyond those immediately adjacent to a site, and to refer to a threshold for acceptability of the impacts on amenity considerations such as daylight that is consistent with other policies in the Plan.

- Policy CDH01 (part c), criterion vii.): corrections to refer to and align with Policy CDH07 and not Policy CDH05.
 - Policy CDH01 (part c), criterion viii.): amendment to broaden its scope to address pollution impacts beyond only noise.
52. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to draw attention to relevant supporting text to London Plan Policy D6 including paragraphs 3.6.2 and 3.6.5, reference the Healthy Streets Approach at London Plan Policy T2, amend paragraph 6.4.2 so it is positively worded, clarify at paragraph 6.5.1 that not all small site development will constitute infilling, amend paragraph 6.6.1 to reflect the approach to Secured by Design and include references to relevant fire safety legislation to support Policy CDH01 c) iv., delete paragraph 6.7.3 to avoid inconsistency issues with the Plan approach to heritage, and delete paragraph 6.9.2 about dirty storage space due to a lack of relevant evidence about that matter, and explain the role of design review panels with regard to Policy D4 of the London Plan.
53. Additionally, the MM to the supporting text for Policy CDH01 will need to include updates to Table 9 to incorporate the Notes to Table 3.1 of the London Plan and delete Footnote 3 about ceiling heights, which does not reconcile with London Plan Policy D6(F). Table 10 also requires revision to reflect the definition of 'habitable room' in the glossary to the London Plan, all elements of Policy D6(F) including standards 2, 4 and 8, and Policy D6(C) in respect of single and dual aspect dwellings. Furthermore, the part of the 4th row of Table 10 about noise exposure categories C and D is unclear and has not been justified, and thus should be deleted.

Policy CDH02 - Sustainable and Inclusive Design

54. A MM for soundness and general conformity with the London Plan should include the following changes:
- Policy CDH02 (part a): correction is required to align with Policy ECC01 and paragraph 20(d) of the Framework in respect of climate change.
 - Policy CDH02 (part b): delete, as summarises only some requirements of Policy ECC01, and part (a) refers to Policy ECC01 in any case.
 - Policy CDH02 (part c): amendments to be clear that BREEAM is only to be applied to development proposals for non-residential buildings.
 - Policy CDH02 (part d): rewording to clarify that SPDs are guidance only.
 - Policy CDH02 (part e): amend to clarify that Inclusive Design Statements are required within Design and Access Statements to ensure alignment with Policy D5 of the London Plan.
 - Policy CDH02 (part e), criterion ii.): clarify the term 'use them' with wording such as 'access developments and use their facilities'.

- Policy CDH02 (parts f) and g): replace with a reference to Policy D7 of the London Plan, as the Plan is unclear in referencing some but not all of that policy and its supporting text at paragraphs 3.7.6 and 3.7.7.

55. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to make clear that the criteria for Inclusive Design Statements set out by paragraph 3.5.3 of the London Plan apply in addition to the criteria in part e) of Policy CDH02. Additionally, changes are needed to paragraph 6.13.3 to replace a reference to Part L of the Building Regulations with London Plan Policy SI2 as the latter requires Part L criteria to be exceeded by major development, and paragraph 6.13.4 so it aligns with the Framework's approach to heritage assets.

Policy CDH03 - Public Realm

56. A MM for soundness and general conformity with the London Plan should include the following changes:

- Policy CDH03 (1st paragraph): amend to provide an opening sentence to make clear that compliance with parts (a) to (h) is required so that development will contribute positively to the public realm.
- Policy CDH03 (part b): amend to reflect the Healthy Streets Approach in Policy CDH01.
- Policy CDH03 (part d): revise to clarify that it seeks to address safety and security issues for where crowds may congregate and to draw a clear distinction between the purposes of criterion iv. of Policy CDH01.
- Policy CDH03 (part f): update to delete reference to 'public realm design frameworks' as the Council has indicated that no such frameworks have been published or adopted. Additionally, revisions are necessary to highlight that requirements relating to the Public London Charter are set out in London Plan Policy D8(H), and that 'due regard' should be given to the Council's town centre strategies.
- Policy CDH03 (part g): changes are required to align with the National Model Design Code in encouraging rather than requiring the incorporation of public art in the design of development.
- Part (h): replace the ambiguous reference to 'Legible London' with a requirement that due regard is given to Transport for London's Streets Toolkit in respect of wayfinding signage.

57. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to paragraph 6.17.1 to clarify the intentions of part c) of Policy CDH03 in respect of family and young people friendly environments. Clearer signposting to the Public London Charter and the Council's adopted strategies for town centres are also needed for effectiveness. Furthermore, revision to paragraph 6.17.4 is needed to provide appropriate flexibility as to when planning conditions or obligations will be required.

Policy CDH04 - Tall Buildings

58. A MM for soundness and general conformity with the London Plan should include the following changes:
- Policy CDH04 (part a): delete 'strategic' from the opening sentence; revise the definition of a tall building so there is no upper storey or metre height limit; delete the 7th to 9th bullet points and footnote 27, as firm evidence to support tall buildings in New Southgate Opportunity Area has not been provided, and the major thoroughfare and town centre locations identified do not fully align with the Tall Buildings Study Update; create a new criterion that makes clear that the locations specified on Map 4 may be appropriate for tall buildings; and clarify that Annex 1 includes site allocations that are identified as potentially appropriate for tall buildings.
 - Policy CDH04 (part b) and part c): delete, as there is no substantive evidence as to where very tall buildings may be appropriate, and the criteria for determining whether to permit proposals for very tall buildings is not clear.
 - Policy CDH04 (part d): update and clarify the status of relevant current and potential future SPDs and make clear that SPDs are guidance only.
 - Policy CDH04 (part e): replace with a reference to Policy D9(C) of the London Plan, and make clear that the locally important views identified on Map 4 are a relevant consideration for applications.
59. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to explain that proposals for tall building development outside the locations identified in part a) of Policy CDH04 will be considered against the development management considerations contained in parts d) and e) as modified; highlight that guidance regarding potential heights and locations of tall buildings is identified in the Tall Buildings Study Update; amend paragraph 6.18.2 to explain the Council's aims for the policy and clarify how visual impact will be addressed in line with Policy D9(C) of the London Plan; and alter paragraph 6.18.5 to explain that the potential for tall buildings in New Southgate Opportunity Area may be considered as part of the early review of the Plan so that the Council's intended future approach is clear.
60. Furthermore, Map 4 should be updated to include all the locations identified in the Tall Buildings Study Update that may be appropriate for tall buildings, including clusters 2, 4, 6, 8 and 10 identified on page 30, the clusters around Whetstone and North Finchley identified on page 39, and the Finchley Central Town Centre area identified on page 45. These changes are required so that potentially appropriate locations for tall buildings are identified and reflect the evidence base. The other locations specified in part a) should also be reflected accurately on Map 4, as should the four viewing corridors that are identified as locally important. In order to ensure that the information on Map 4 is legible, it is recommended that its contents are reflected on the Policies Map.

Policy CDH05 - Extensions

61. A MM for soundness and general conformity with the London Plan should include the following changes:
- Policy CDH05 (1st paragraph): revise to clarify the roles and status of current and proposed future SPDs, and confirm that SPDs are guidance.
 - Policy CDH05 (parts a), b) and c): rearrange references to remove duplication of requirements covered in more than one part of the policy, e.g. materials is currently referenced in both parts a) and c).
 - Policy CDH05 (parts d), f), g), h) and j): update the thresholds of acceptability for the impacts of development on the matters relevant to these parts (e.g. living conditions) to ensure that they are consistent with other policies in the Plan.
 - Policy CDH05 (part e): re-word to clarify that the requirement is to retain satisfactory amenity space in accordance with Policy CDH07.
 - Policy CDH05 (part i): delete as the assessment criteria is unclear and ineffective, and environmental considerations would be suitably addressed by other policies in the Plan.
 - Policy CDH05 (part j): delete as it has not been demonstrated that energy efficiency requirements above Building Regulations are justified for extensions to existing buildings (other than if major development, which would otherwise be suitably addressed by Policy SI 2 of the London Plan).
 - Policy CDH05 (part k): delete as redundant following the change to part e) of the policy.
62. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to paragraph 6.19.13 to clarify that the policy is intended to apply to all forms of extension including where new residential units would be created.

Policy CDH06 - Basements

63. A MM for soundness and general conformity with the London Plan should include the following changes:
- Policy CDH06 (policy title): amend to make clear that the policy is also applicable to different forms of below ground development.
 - Policy CDH06 (1st paragraph): revise to clarify the roles and status of current and proposed future SPDs, and confirm that SPDs are guidance.
 - Policy CDH06 (part a): update wording to refer to 'trees' alongside 'tree roots'.
 - Policy CDH06 (part b): amend to require that amenity space remains in accordance with Policy CDH07. No evidence has been provided for imposing a 50% amenity space restriction which should be removed. Policy CDH01 otherwise addresses character and appearance matters.

- Policy CDH06 (part c): amend to refer to ground stability to reflect paragraph 6.20.1 and ensure consistency with paragraph 183 of the Framework.
- Policy CDH06 (part d): replace 'property' with 'building' given that below ground works could create new planning units and thus not only extend existing properties.
- Policy CDH06 (part f): rewording is required so that the approach to ceiling heights accords with Policy D6(F) of the London Plan.
- Policy CDH06 (part h): replace with a requirement that the proposal is in compliance with flood risk requirements of national policy. As submitted this criterion is inconsistent with the flood risk vulnerability classification of basement dwellings in Annex 3, together with associated guidance in PPG that such developments should not be permitted in Flood Zone 3a or 3b and that an exception test is required for proposals in Flood Zone 2.

64. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to paragraph 6.20.1 to clarify the forms of development to which the policy is applicable.

Policy CDH07 - Amenity Space and Landscaping

65. A MM for soundness and general conformity with the London Plan should include the following changes:

- Policy CDH07 (part a): reword including its associated criteria i. and ii. to make clear that development proposals at a minimum should meet the amenity space standards set out in Table 11 and provide play spaces in accordance with Policy S4 of the London Plan (rather than the Mayor's SPG).
- Policy CDH07 (part a, criterion iii.): delete, as Policy D6(F) of the London Plan sets out minimum standards and there is no firm local evidence that planning contributions towards off-site amenity space provision would be an appropriate strategy to compensate for any under provision of private outside space.
- Policy CDH07 (part b): rewording is needed to clarify that the five criteria only apply where hard or soft landscaping is proposed.
- Policy CDH07 (part b, criterion i.): amend to clarify the elements regarding amenity, access and parking areas, and refer to the amenity of both existing and future occupiers of property.
- Policy CDH07 (part b, criterion ii.): clarify that landscaping should be designed to provide biodiversity benefits such as habitat creation where possible.
- Policy CDH07 (part b, criterion iii.): include a reference to accordance with Policy ECC06 at the end of the first sentence for consistency and then remove the second sentence.

- Policy CDH07 (part b, criterion iv.): reword to generally conform with Policy G7(C) of the London Plan in respect of the retention and replacement of trees.
 - Policy CDH07 (part b, criterion v.): clarify that sustainable drainage systems should be provided in accordance with Policy ECC02A of the Plan for consistency.
66. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to ensure general conformity with Policies D6 and S4 of the London Plan, particularly in respect of communal space in paragraph 6.21.2, and by deleting from paragraph 6.21.3 that under provision of private outdoor space may be permissible where equivalent additional internal space would be provided.
67. Additionally, the MM to the supporting text for Policy CDH07 will need to include updates to Table 11 to replace the space standards for flats and houses with the standards specified by Policy D6(F)9 of the London Plan, as compelling justification for imposing local standards for flats and differing sizes of houses, has not been provided.

Policy CDH08 - Barnet's Heritage

68. Policy CDH08 requires comprehensive redrafting so that it aligns with the Framework approaches to the historic environment. The alterations required to be made in an MM should set out clear procedures for designated and non-designated heritage assets, including considering the potential impact of a proposed development on the significance of designated heritage assets and the approaches where a proposal would result in substantial or less than substantial harm.
69. The MM should also address the following to ensure that Policy CDH08 is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan:
- Consistency in terminology for archaeological assets of heritage interest, and clarification in respect of decision making for Barnet's Archaeological Priority Areas (APAs) and the roles of 'GLAAS' and 'HADAS' as potential consultees for applications.
 - Accordance with the Council's duties at sections 16(2), 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
 - The policy's requirement for contracts of works to be secured so development proceeds within specific timescales has not been justified and thus should be excluded from the policy.
70. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to clarify which forms of heritage asset are designated and non-designated in

Table 12. In this regard, it should be noted that APAs are not designated heritage assets, but that footnote 68 of the Framework may be applicable for certain non-designated heritage assets of archaeological interest. It should also be clarified that non-designated heritage assets are referred to as 'local heritage assets' by the Council, and the approach to identifying non-designated heritage assets in accordance with the PPG also needs to be made clear.

Policy CDH09 - Advertisements

71. A MM for soundness and general conformity with the London Plan should include the following changes:
- Policy CDH09 (first paragraph): the addition of a sentence is needed to clearly establish that advertisements are subject to control in the interests of amenity and public safety only.
 - Policy CDH09 (part a): to prevent overlap with the above addition, references to amenity and public safety should be deleted.
 - Policy CDH09 (part b): delete reference to conservation areas, which would be addressed within this part as one of several forms of heritage asset.
 - Policy CDH09 (part e, criterion ii.): for effectiveness, separate into three different parts, one for light pollution and illumination which clarifies that not all illumination would be resisted, a second about physical or visual obstruction, and a third about visual clutter.
 - Policy CDH09 (final paragraph): delete, as there is no firm local evidence that the prevention of advertisements to shopfronts above fascia or ground floor level is necessary, and such matters could be considered as part of an assessment of amenity on an individual basis.
72. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to replace references to 'permission' with 'consent', clarify that highway safety is an aspect of public safety in paragraph 6.34.1, ensure that paragraph 6.34.3 reconciles with part (a) of the policy in requiring 'unacceptable harm' to be avoided, and that paragraph 6.34.6 accurately reflects the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 in respect of exempting advertisements from deemed consent, and amends the reference to the Council's Advertising Policy 2017, which indicates that it is not relevant to applications.

Policy TOW01 - Vibrant Town Centres (including Table 13)

73. A MM for soundness and general conformity with the London Plan should include the following changes:
- Policy TOW01 (1st paragraph): a cross reference is required to Table 13 to provide certainty of where the hierarchy of town centres is defined.
 - Policy TOW01 (part a, sub-criterion i): amendments to emphasise the support for redevelopment within Brent Cross Growth Area in accordance

with Policy GSS02. It should also clarify that it will provide a strong retail offer, together with a wider mix of main town centre uses, such as offices and other commercial uses, community, cultural and residential uses as part of the creation of a new Metropolitan Town Centre for North London.

- Policy TOW01 (part a, sub-criterion ii): changes are required to align with Policy GSS05, including to clearly set out beyond the approach in Edgware Major Town Centre of consolidation and qualitative improvements to retail floorspace, that proposals for community uses and other main town centre uses (including offices and leisure) will be supported where they enhance its viability and vitality and complement the delivery of intended levels of housing growth.
- Policy TOW01 (part a, sub-criterion iii): changes are required to align with Policy GSS04, including to clearly set out the support for improvements to retail, community and other main town centre uses (including offices and leisure), that are proportionate to supporting the proposed housing growth and the viability and vitality of Cricklewood District Town Centre.
- Policy TOW01 (part a, sub-criterion iv): changes to provide certainty that District Town Centres are suitable locations to accommodate residential development, and that provision of proportionate levels of floorspace for retail, community and other main town centre uses (including offices and leisure) will be supported provided that they accord with Policy GSS08.
- Policy TOW01 (part a, sub-criterion v): changes are required to cross-refer to the list of Local and Neighbourhood Centres as set out in Table 13, together with clarification of the definition of 'local level of retail' (i.e. smaller scale needs such as day to day convenience retail, social and community needs) and that residential-led mixed use development should be of a proportionate scale.
- Policy TOW01 (part c): amendment required to provide certainty for decision makers of what is considered to constitute 'Lower PTAL' in terms of the support for relocation of leisure uses from those locations. Re-wording is also necessary to be clear that the support for expansion of leisure uses is in town centre locations listed under part a) where opportunities of suitable scale arise.
- Policy TOW01 (part d): changes are required to ensure that the requirement for an impact assessment is only applied to proposals for more than 500 sq.m of retail or leisure uses in an edge of centre or out of centre location relative to the Major and District Town Centre boundaries identified on the Policies Map.

74. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary updates to Table 13 to clarify that there are 16 local and neighbourhood centres and additions to the Glossary to define Local and Neighbourhood Centres, together with changes to paragraphs 2.5.1, 7.1.1 to 7.6.8. Modifications are also required to paragraphs 7.2.7 and/or 7.4.3 to clearly explain the omission of strategic growth targets for comparison and convenience retail space and rather that the Plan instead intends to meet location-based opportunities for

retail and other main town centres that is proportionate to their scale and supporting housing growth as part of mixed-use development.

75. In addition, the changes should also include clarification of the status of the new Metropolitan Town Centre at Brent Cross and explain that the approach to the sequential test relative to Table 13 in part d) of Policy TOW01. This should include that where Major Town Centres and District Town Centres adjoin the Borough boundary as identified in Annex 1 of the London Plan (Edgware, Colindale/The Hyde, Cricklewood and Burnt Oak), an extension of areas of search into the neighbouring local authority areas will be required. The MM should also include a commitment to immediate preparation of up-to-date evidence relating to town centres and any floorspace needs for retail and other main town centre uses to inform the committed early review of the Plan.

Policy TOW02 - Development Principles in Barnet's Town Centres, Local Centres and Parades

76. A MM for soundness and general conformity with the London Plan should include the following changes:
- Policy TOW02 (3rd paragraph, criterion a): changes are required to ensure consistent terminology for Local and Neighbourhood Centres as identified in Table 13; to cross refer to primary retail frontages depicted on the Policies Map, and to recognise that the safeguarding approach applies to Use Class E albeit with a strong preference for retail. It should also be made clear that the criterion applies to proposals in local parades (as otherwise referred to in Policy TOW01).
 - Policy TOW02 (3rd paragraph, criteria b to h): amendments should be made to criterion c) to clarify the consideration of the significance of any reduction of retail facilities; to criterion d) to clarify that properties are expected to retain active frontages at ground floor level; to criterion f) to ensure the likelihood of the proposal to attract visitors is considered, and criterion h) to remove the linkage to criterion n) and clarify the expected period of continuous marketing. Restructuring is then required to reflect that criteria c) to h) are requirements of proposals for alternative uses at ground floor level that don't meet criterion a) and therefore, they should be altered to be sub-criteria of criterion b) in that respect.
 - Policy TOW02 (3rd paragraph, criterion i): the previous change would make this criterion redundant, and it should be deleted to avoid repetition.
 - Policy TOW02 (3rd paragraph, criteria j to n): amendments should be made to criterion j) to be clear of the suitability of utilising upper floors for alternative uses including residential, employment and community provision; to criterion k) to reflect that development with a significant adverse effect on the living conditions of occupiers of neighbouring properties will be resisted in accordance with the Agent of Change principle; and to criterion m) to clarify the supportive approach to meanwhile uses of vacant sites and buildings that make a positive contribution to a town centre's viability and vitality. Criteria j) to n) should

also be re-numbered to criteria c) to g) accordingly to reflect the prior changes to criteria b) to i).

77. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to paragraphs 7.7.1 to 7.7.6. A new paragraph should also be added after 7.7.3 to explain the implications of recent changes to the Use Classes Order and related permitted development rights, including those which apply to Class E and Class MA and influence the requirements relating to continuous marketing periods. The MM should also include updates to paragraph 7.7.6 to emphasise the importance of reducing vehicular traffic to improving public realm.

Policy TOW03 - Managing Hot Food Takeaways, Adult Gaming Centres, Amusement Arcades, Betting Shops, Payday Loan Shops, Pawnbrokers and Shisha Bars

78. A MM for soundness and general conformity with the London Plan should include the following changes:
- Policy TOW03 (part a, and sub-criteria i to vi): re-wording of part a) is required to ensure a policy approach to hot food takeaways that is positively prepared by indicating the circumstances and locations such as town centres where proposals will be supported whilst preserving their viability and vitality by avoiding over-concentrations of such a use. Associated changes are required to suitably re-phrase sub-criteria i) to vi) as related requirements rather than restrictions. Those changes should also remove duplication between criteria iv) and v) with respect to odour controls and in criteria iv) seek to ensure that there is no unacceptable impact on the living environment for nearby residents in terms of noise, vibrations, traffic disturbance and litter, and remove any overlaps with other policies of the Plan (for example with Policies TOW01 and ECC02).
 - Policy TOW03 (part a, sub-criterion vii): this should be removed as a sub-criterion of part a) and should instead be a separate part of the policy that indicates when and how hot food takeaway proposals should demonstrate compliance with the Council's Healthy Catering Commitment.
 - Policy TOW03 (part a, new sub-criteria after vi): addition of a new criteria to ensure that details of suitable drainage facilities (including effective fat/grease traps) are provided with proposals for hot food takeaways, together with a proposed schedule of maintenance.
 - Policy TOW03 (part b, and sub-criteria viii, xi and xii): re-wording of part b) to ensure that the policy approach is positively prepared relative to provision of the identified uses by indicating the circumstances and locations such as town centres where proposals will be supported. This should include clarifying the intention to address health inequalities, whilst preserving the viability and vitality of Barnet's town centres by avoiding an over-concentration of the stated uses. Associated changes will be required to suitably re-phrase sub-criteria viii), xi) and xii) accordingly as related

requirements rather than restrictions, and also to re-number them as sub-criteria i) to iii) of part b).

- Policy TOW03 (part b, sub-criterion ix): a requirement that betting shops, adult gaming centres, amusement arcades, pawnbrokers, pay day loan shops and shisha bars should be located more than 400m from the boundary of an existing school or youth centre is not justified by supporting evidence of its necessity to avoid demonstrable harm and therefore, should be deleted.
- Policy TOW03 (part b, sub-criterion x): this should be removed as a sub-criterion of part a) and should instead be a separate part of the policy that indicates the specific circumstances where the Council will expect Health Impact Assessments to accompany the related proposals.

79. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to paragraphs 7.8.1 to 7.8.8. Those changes should include clarification of the approach to hot food takeaways taking account of the extent of existing premises and requirement to control new proposals, together with a new paragraph to explain the approach to drainage and fat/grease traps and the details that should accompany proposals for hot food takeaways.

Policy TOW04 - Night-Time Economy

80. A MM for soundness and general conformity with the London Plan should include the following changes:

- Policy TOW04 (first sentence): re-wording to cross-refer to the requirement to accord with Policy HC6 of the London Plan and clarify that the policy is also relevant to evening economy uses.
- Policy TOW04 (part a): re-wording to emphasise that the scale and type of use should reflect the role and function of the town centre, and positively contribute to its viability and vitality by preserving or enhancing existing night-time economy activities or creating new ones.
- Policy TOW04 (part b): amendments to clarify that proposals should accord with any relevant requirements of Policies TOW01, TOW02 and TOW03.
- Policy TOW04 (part c): changes are required to ensure that proposals would not result in unacceptable impacts upon highway safety or the living environment of adjoining or adjacent residential and non-residential uses, in terms of noise, disturbance, odours and anti-social behaviour, and remove any overlaps with other policies of the Plan (for example with Policies TRC01 and ECC02).
- Policy TOW04 (part d): re-wording to ensure that proposals demonstrate that they would not result in unacceptable impacts arising from a cumulative effect with the number, capacity and location of other night-time economy uses in the surrounding area.

- Policy TOW04 (part e): amendment to cross-refer to the requirements of Policy CDH08 where proposals have a relationship with the historic environment or heritage assets within Barnet's town centres.
- Policy TOW04 (part f): this should be deleted to reflect the previous changes and avoid duplication and repetition of the 1st paragraph.

81. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to paragraphs 7.9.1 to 7.9.3.

Policy CHW01 - Community Infrastructure

82. A MM for soundness and general conformity with the London Plan should include the following changes:

- Policy CHW01 (1st paragraph): clarify that it applies to outdoor sports facilities including playing fields and pitches and make consequent changes to the policy to provide consistency with paragraphs 92, 93 and 99 of the Framework and general conformity with Policy S5 of the London Plan.
- Policy CHW01 (part c): amend so 'multi-purpose community facilities' are referred to consistently and clarify that such facilities are preferred in but not limited to locations in Growth Areas, town centres, local centres and the public sector estate to generally conform to London Plan Policy S1.
- Policy CHW01 (part d): delete as it unnecessarily overlaps and complicates the more detailed approach covered by the 3rd paragraph and associated bullets about the loss or replacement of existing community facilities.
- Policy CHW01 (part e): revise to include the Council's preference for large scale development to provide community facilities or land for such facilities on site to meet the needs generated by the development.
- Policy CHW01 (part g): change 'allocate sites' to 'support proposals' or use similar wording, as the Council has not indicated any intention to allocate sites by means of a DPD in this regard.
- Policy CHW01 (1st and 2nd bullets): make changes to reflect the approach to outdoor sports facilities, including playing fields and pitches, as per paragraph 99 of the Framework and Policy S5 of the London Plan. In addition, clarify what is meant by 'not suitable' by replacing it with 'not fit for purpose' or similar wording; make clear that facilities should be demonstrated to be not suitable 'or' viable; and amend to incorporate the criteria of Policy S1(F) of the London Plan.
- Policy CHW01 (new paragraph below 2nd bullet): provide additional wording to reflect Policy S1(G) of the London Plan.
- Policy CHW01 (4th paragraph): delete the nomination of Assets of Community Value as a potential planning consideration, as there is no evidence that nominations will necessarily lead to the formal designation of such assets.
- Policy CHW01 (criteria i., ii. and iii.): delete to resolve the unjustified limitations on the locations wherein new community infrastructure is

supported, and to resolve overlap and internal consistency issues with the 3rd paragraph.

- Policy CHW01 (criterion iv.): remove reference to ‘wider national policy requirements’, which is not clearly defined.
- Policy CHW01 (6th paragraph): delete the requirement for all proposals to be subject to legal agreements as these would not be required or proportionate for all forms and scales of new community infrastructure.

83. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to make clear that although public houses constitute community facilities, Policy CHW04 provides a separate approach for public houses notwithstanding where its part (c) is applicable. References to the Council’s Community Asset Strategy, Community Asset Implementation Plan and Community Participation Strategy should also be deleted, as more relevant and up-to-date information is contained in the Infrastructure Delivery Plan (IDP). Additionally, paragraphs 8.2.2 and 8.5.3 should make clear that new community uses including indoor sports facilities are encouraged in Growth Areas, town centres and local centres. Furthermore, reference to ‘Lifetime Neighbourhoods’ should be deleted, as it is not explained or otherwise justified in the Plan.

Policy CHW02 - Promoting Health and Wellbeing

84. A MM for soundness and general conformity with the London Plan should include the following changes:

- Policy CHW02 (new part): a change is needed to clarify that the Health Impact Assessments referred to in the policy are required for large scale development proposals.
- Policy CHW02 (part c): rewording is needed to make clear that Sport England’s Active Design Principles are guidance to which due regard should be given only.
- Policy CHW02 (part d): amend as Policy CDH03 does not require ‘new and improved’ public realm to be provided as indicated.
- Policy CHW02 (part e): rewording required to ensure consistency with the amended approach to the Healthy Catering Commitment in the MM to Policy TOW03.
- Policy CHW02 (part f): amend to refer to Policy CDH01 in respect of the Healthy Streets Approach.
- Policy CHW02 (part g): revise so its requirements fully accord with the approach of Policy ECC02 to air quality.
- Policy CHW02 (part h): revise so its requirements fully accord with the approach of Policy TRC01 to active travel and sustainable transport modes.

85. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, a necessary addition to

explain how it will be established whether the contributions referenced in part (b) of the policy would be needed and calculated, in alignment with paragraph 11.1.37 of the London Plan and with reference to the London Healthy Urban Development Unit Planning Contributions Model. Additionally, a reference should be added to refer to Policy S6 of the London Plan to ensure that its requirements regarding public toilets are fully considered for relevant proposals, and refer to Policy D8 of the London Plan and not Policy D7 at paragraph 8.17.5. Furthermore, a change is needed to the term 'HIA' so that it aligns fully with the definition in the London Plan's glossary.

Policy CHW03 - Making Barnet a Safer Place

86. A MM for soundness and general conformity with the London Plan should include the following changes:
- Policy CHW03 (parts a to g): amend to clearly distinguish the parts of the policy that identify Council commitments and the parts that set out criteria for development proposals to comply with, and consolidate the parts so there are fewer overlapping criteria.
 - Policy CHW03 (part b): reword to state 'support development proposals that reflect Secured by Design principles' or similar, and bring the policy into closer alignment with Policy CDH01. Additionally, the specific requirement for all development proposals to work with Secured by Design Officers is not justified and should be deleted.
 - Policy CHW03 (part i): amend as Policy CDH03 does not expressly promote safer streets and public areas including open spaces as identified.
87. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to explain what is meant by 'town centre strategy programme' in part (h) of the policy, amend paragraph 8.20.4 to make clear that Secured by Design principles and consultation with the Metropolitan Police Secured by Design Officers are encouraged, and signpost to Policy D12 of the London Plan in respect of fire safety.

Policy CHW04 - Protecting Public Houses

88. A MM for soundness and general conformity with the London Plan should include the following changes:
- Policy CHW04 (part a, criterion 1): clarify that the Council will protect public houses where they have a heritage, economic, social or cultural value to local communities, 'or' where they contribute to wider policy objectives for town centres.
 - Policy CHW04 (part a, criterion 2): remove support only for public houses that come forward as mixed-use development, which would be unduly restrictive and is unjustified.

- Policy CHW04 (parts b and d): replace with a reference to London Plan Policy HC7; as for part b) there is no substantive local evidence that a vacancy test is required and Policy HC7(B) with its supporting paragraph 7.7.7 provide a robust means to test whether public houses will endure.
- Policy CHW04 (part c): make clear that where London Plan Policy HC7 is satisfied, proposals for other community uses will be supported, and alternate uses will be permitted where the relevant criteria of Policy CHW01 that relate to proposals involving the loss or replacement of existing community facilities are met. Those criteria of Policy CHW01 should be specified in Policy CHW04 for clarity.
- Policy CHW04 (final paragraph): delete the nomination of Assets of Community Value as a potential planning consideration, as there is no evidence that nominations will necessarily lead to the formal designation of such assets.

89. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to clarify that Policy CHW01 only applies to public house proposals where part (c) applies.

Policy ECY01 - A Vibrant Local Economy (including Table 14)

90. A MM for soundness and general conformity with the London Plan should include the following changes:

- Policy ECY01 (first paragraph): re-wording is required to provide certainty of the appropriate locations in the Borough where the Council will prioritise promoting new employment opportunities to ensure consistency with strategic policies of the Plan (i.e. the specific Growth Areas, Opportunity Areas, Town Centres and Locally Significant Industrial Sites as identified in Table 14 and on the Policies Map) and Policy E8 of the London Plan insofar as identification of locally significant sectors and clusters of businesses
- Policy ECY01 (part a): to provide certainty for decision makers and ensure consistency with the approach taken elsewhere in the Plan, the approach to safeguarding of offices as a main town centre use in the context of Class E and the required period of active marketing of a period of 12 months to be undertaken for proposals seeking redevelopment of office uses outside of Town Centres and edge of centre locations should be specified (to ensure accordance with paragraphs 6.1.7 and 6.7.5 of the London Plan).
- Policy ECY01 (part b): in the interest of certainty of office requirements to be provided in the Plan and the role of this non-strategic policy, changes are required to cross-refer to the strategic policies (such as Policy BSS01 and GSS01) that set out the relevant requirements. In addition, part b) should identify the locations where new office proposals will be supported (i.e. specific Growth Areas, Opportunity Areas, and District Town Centres) and the approach to be taken for proposals in other locations that are not in

an existing town centre (i.e. the application of the sequential test for main town uses).

- Policy ECY01 (part c): amendments are required to link to the LSIS identified in Table 14 and clarify that proposals for office uses in those locations should be ancillary to the main employment use of premises or land.
- Policy ECY01 (part f): changes are required to ensure consistency with and link the approach to warehousing uses or uses which generate high levels of movement with the strategic approach to and identification of Major Thoroughfares in Policy GSS11 (given that Tier 2 Roads are amongst those proposed to be deleted from the Policies Map).
- Policy ECY01 (part g): to ensure consistency with Policy E7 of the London Plan, changes are required to provide certainty that proposals for co-location to support delivery of residential or other uses, such as social infrastructure, should only occur as part of intensification of a LSIS with no net-loss of employment floorspace and should be supported by a co-ordinated master planning process.
- Policy ECY01 (part h): re-wording is required to delete reference to the Article 4 direction following its expiry in June 2022 and to also clarify the protection sought for existing light industrial uses in Barnet's town centres and LSIS. As such uses fall within Use Class E (alongside main town centre uses), it should be clarified that it is proposals for development or change of use where permission is required that involve the loss of employment accommodation in those areas that will not be supported.
- Policy ECY01 (part j, criterion ii): changes are required to ensure consistency with and linkage to the approach to uses that generate high levels of movement as addressed in part f) of the policy and the strategic approach to and identification of Major Thoroughfares in Policy GSS11.
- Policy ECY01 (part j, criterion iv): re-wording to clarify that the support for new employment space is subject to the site not being allocated in Annex 1 of the Plan for an alternative use.
- Policy ECY01 (part k): addition to clarify that the fit out of all employment premises should be to at least Category A standard.
- Policy ECY01 (part l): amendments are required to ensure that travel plans, transport statements or transport assessments are provided in accordance with national policy, Policy T4 of the London Plan and are consistent with any related MMs to Policy TRC01 of the Plan.
- Policy ECY01 (part m): to accord with Policy E7 of the London Plan, this criteria should be deleted as the policy approach in the Plan should seek to avoid and therefore, not encourage proposals that involve a net loss of employment floorspace.

91. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to paragraphs 2.5.3, 3.3.3, 9.1.1 to 9.9.8. Updates are also required to Table 14 to remove the column relating to the Article 4 Direction following its expiry, and the

consequential removal of other references to the Article 4 direction elsewhere in the Plan at paragraphs 4.5.4, 4.21.5, 5.5.9 and associated footnotes.

92. The MM should include further explanation of the intended approach of prioritising the safeguarding and efficient use of industrial land in LSIS as the most sustainable employment locations, whilst addressing the identified need for additional floorspace through encouraging the intensification and its diversification of LSIS (including with affordable workspace to provide additional industrial capacity). It should also be clear that larger scale requirements for Use Class B8 that cannot be accommodated in LSIS are necessarily directed to the Strategic Industrial Locations within other London Boroughs as identified in Table 6.2 of the London Plan and in accordance with its Policies E4 and E5.
93. In addition, the MM should also clarify in the supporting text the approach to proposals for new employment uses in LSIS or outside of a town centre that would fall under Use Class E (i.e. offices and uses related to light industrial or research and development). This should include the potential use of conditions and/or planning obligations to protect the intended employment use and the viability and vitality of Barnet's Major and District Town Centres by restricting changes to retail or other main town centre uses within the same Use Class, where appropriate.

Policy ECY02 - Affordable Workspace (including Table 15)

94. A MM for soundness and general conformity with the London Plan should include the following changes:
 - Policy ECY02 (part a): amendments in the interest of consistency and certainty to clarify that the policy applies to proposals for new employment floorspace in the Boroughs designated employment areas, together with the Brent Cross Growth Area, Brent Cross West Growth Area, Edgware Growth Area, New Southgate Opportunity Area, and Barnet's District Town Centres, to sustain a mix of business uses which contribute to the character of an area. It should also be made clear that a minimum 10% of affordable workspace, or equivalent contribution to off-site provision, will typically be sought unless a viability assessment accompanying the planning application demonstrates that it would undermine the deliverability of the development.
 - Policy ECY02 (part c): modify the approach to remove duplication of part b) with respect to unit sizes and types. The amendments should focus part c) on ensuring provision of units that are suitable for sub-division and provide fully customisable spaces for end user requirements and interior specifications, whilst ensuring consistency with the MM to Policy ECY01 that requires minimum Category A fit out of employment development.
95. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to Table 15 and paragraphs 9.10.1 to 9.10.6. The changes should clarify that the policy applies to major developments for new employment floorspace and/ or

which would provide net additional floorspace as extension(s) to existing employment premises. The MM to the supporting text should include clarification of the calculation formula for affordable workspace contributions to be used (notwithstanding any associated guidance to be provided in the Planning Obligations SPD) and that any contributions sought would need to meet the relevant requirements of national policy and the CIL Regulations and take account of any viability assessment accompanying the application. The MM should also provide a definition of 'touch down' working and 'accelerator space' as referred to in Policy ECY02, either in the supporting text or the Glossary of the Plan.

Policy ECY03 - Local Jobs, Skills and Training

96. A MM for soundness and general conformity with the London Plan should include the following changes:
- Policy ECY03 (1st sentence): changes are required to provide certainty that qualifying development (as referred to in part a) where the Council seek to increase employment opportunities in the Borough, would be major developments where 20 or more full-time equivalent (FTE) jobs would be created.
 - Policy ECY03 (part a): amendment to require proposals to set out the skills, employment and training opportunities to be delivered and delete the requirement for a Local Employment Agreement (to align with the approach of Policy E11 of the London Plan).
 - Policy ECY03 (part c): re-wording to reflect the status of SPDs to ensure that decision makers have only regard to any relevant SPD guidance intended to be provided with respect to jobs, skills and training.
97. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to paragraphs 9.11.1 to 9.11.6. The changes to the supporting text should include clarification of how FTE job creation will be calculated for the purpose of decision making in terms of both permanent jobs arising from development, and where temporary jobs are created during the construction period. The supporting text should also be modified to encourage developers to liaise with the Council at an early stage, preferably pre-application, to identify opportunities associated with proposed developments.

Policy ECC01 - Mitigating Climate Change

98. A MM for soundness and general conformity with the London Plan should include the following changes:
- Policy ECC01 (part a): re-wording to align with part c) of Policy BSS01 in terms of locations for growth and paragraph 20 of the Framework in respect of climate change mitigation and adaptation.

- Policy ECC01 (part b): explain what is meant by ‘promote the highest environmental standards’ and ‘exemplary levels of sustainability’, correct the titles of the referenced SPDs, and make clear that the SPDs contain guidance only.
- Policy ECC01 (part d, criterion i.): replace ‘energy statement’ with ‘energy strategy’ to reflect the terminology of Policy SI2 of the London Plan. Similar changes should be made throughout the Plan. In addition, delete reference to Part L of the Building Regulations, to be clear that it is the zero-carbon target that is sought to be achieved by major development in accordance with Policy SI2 of the London Plan.
- Policy ECC01 (part d, criterion ii.): amend to make clear that minor development proposals should meet the Council’s carbon reduction target of at least 6% beyond Part L of the Building Regulations ‘where feasible’, as sufficient evidence to justify that target as a requirement in all circumstances has not been provided.
- Policy ECC01 (part e): delete requirements relating to decentralised energy and instead align with Policy SI3 of the London Plan.
- Policy ECC01 (part f): clarify the scale of development to which it applies and what is meant by ‘where feasible’.
- Policy ECC01 (part g): refer to both policies SI2 and D6 of the London Plan in respect of overheating and managing heat risk.
- Policy ECC01 (part h): replace wording relating to harm to the significance of heritage with a reference to Policy CH08.
- Policy ECC01 (new part): additions to ensure that the policy wording is consistent with the Council’s support of the retrofitting, reuse and adaptation of existing buildings at paragraph 10.6.3.

99. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to define ‘carbon’ and ‘decentralised energy’ as per the London Plan definitions; signposts to the explanations regarding the energy hierarchy and the price for offsetting carbon at paragraphs 9.2.2 and 9.2.8 of the London Plan; clarify that Barnet has a carbon offset fund at paragraph 10.3.1; and refer to London Plan policies SI2 and SI3 and clarify that the majority of Barnet is within Heat Network Priority Areas at paragraphs 10.4.1 and 10.4.2. Additionally, it should explain the Council’s carbon reduction aims for heritage assets at paragraph 10.6.3; amend the last sentence of paragraph 10.7.3 to align with Policy CDH07 in respect of the retention and replacement of trees; clarify at paragraph 10.7.4 that policies SI2 and D6 of the London Plan address overheating and that applications for major development and single aspect residential dwellings should be supported by heat assessments as part of energy strategies, and consequently delete the penultimate sentence of paragraph 10.5.4. Furthermore, Table 16 should be deleted as its requirements would be addressed by policies ECC01 and TRC03 and the supporting text as modified.

100. The MM should also clarify that Part L of the Buildings Regulations (2022 edition with 2023 amendments) has been approved since the adoption of the London Plan and therefore, the application of the requirements of its Policy SI2 for major developments to achieve the zero-carbon target should reflect those changes.

Policy ECC02 - Environmental Considerations

101. A MM for soundness and general conformity with the London Plan should include the following changes:

- Policy ECC02 (first paragraph and part a): amend to align with the approaches to air quality at paragraph 186 of the Framework and Policy SI1 of the London Plan.
- Policy ECC02 (part a, criterion ii.): delete reference to the provision of air quality assessments and instead cross refer to where those matters are addressed by Table 17 in part c).
- Policy ECC02 (parts b and c): update and clarify the status of relevant current and potential future SPDs. In addition, amend part c) to refer to tables 17 and 18 and omit reference to the provision of air quality and noise impact assessments, as the tables set out various other requirements beyond the submission of those assessments.
- Policy ECC02 (part f): make clear that demolition and construction management plans may be conditioned where necessary.
- Policy ECC02 (new part): introduce a light pollution criterion to accord with paragraph 185 of the Framework.
- Policy ECC02 (new part): introduce an odour criterion to reconcile with Table 17.

102. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to: necessary changes to the heading of section 10.9 and additions to that section of supporting text on light pollution and consistent references to both noise and vibration. In addition, changes are also required to paragraph 10.9.2 to provide clarification and align with Parts A and B of Policy SI1 of the London Plan regarding where air quality assessments would be required for different scales of development; to paragraph 10.9.3 to align with Parts B and E of Policy SI1 of the London Plan and clarify that all development must be air quality neutral and that where emissions need to be reduced this is done on-site before off-site measures are considered; to paragraph 10.9.4 to clarify whether the need to show an air quality positive approach applies to both major and large scale development, as well as non-residential development; to paragraph 10.9.8 to set out the documents that the Council would consider in respect of assessing noise impacts including the relevant parts of the PPG, delete reference to enabling noise assessments to be conditioned, and clarify the expectations for the submission of noise impact assessments. Changes should also be made to paragraph 10.11.1 to explain the issues that need to be addressed at gas holder sites, and clarify how the criteria in part (e) of Policy ECC02 will be

applied. Paragraph 10.12.1 should also be modified to reflect the requirements of rows 6 and 7 of Table 17.

103. Table 17 also needs amendments to reflect the above; to move the part of row 2 about air quality positive approaches into a new row and ensure that the scale of development to which such approaches applies accords with paragraph 10.9.4; to revise row 3 so it refers to the Mayor's Energy Assessment Guidance; delete row 4 which in substance duplicates row 1; to reword row 6 to clarify that both air quality and dust risk assessments and management plans would only be required where necessary; and add a new row regarding the provision of demolition and construction plans to reflect paragraph 10.12.1 as modified. Furthermore, Table 18 must also be modified to reflect the above; to revise its title to reflect its contents more accurately; to delete row 1 as it contains ambiguous instructions about the preparation of a noise risk assessment prior to the submission of an application; and to remove 'residential' from row 2, as there are other noise sensitive uses than just residential ones.

Policy ECC02A - Water Management

104. Policy ECC02A requires comprehensive redrafting under the Flood Risk heading so that it reflects the Framework's approaches to flood risk, as it is currently not consistent with national policy nor effective in respect of the application of the sequential and exception tests, flood risk vulnerability and flood risk assessments.
105. The MM should also address the following to ensure that Policy ECC02A is sound and in general conformity with the London Plan:
- Policy ECC02A (part b, criterion i.): make clear that improvements to flood defences may be needed and that defended areas should be protected in perpetuity.
 - Policy ECC02A (part b, criterion ii.): clarify that land adjacent to flood defences need to be protected to allow for improvements or replacements to such and provide space for flood water in the event of a breach, and refer to natural flood management techniques, public amenity 'space' and biodiversity 'enhancements'.
 - Policy ECC02A (part f): delete 'for the development'.
 - Policy ECC02A (parts g and h): replace with a reference to Policy S113 of the London Plan to remove inconsistencies between the requirements of these parts.
 - Policy ECC02A (part i): revise to make clear that, where relevant planning conditions or obligations may be required, it will be necessary that management and maintenance arrangements are in place for drainage schemes.
 - Policy ECC02A (part j): revise to align with parts (g) and (h) as modified.

- Policy ECC02A (part k): clarify that major development will be required to demonstrate how appropriate solutions to water capacity issues will be delivered in appropriate timeframes.
- Policy ECC02A (part l): replace with a reference to Policy SI5 of the London Plan.
- Policy ECC02A (part m): amend to align with paragraphs 10.15.3 and 10.15.4 in respect of whether there is flexibility in the water course buffer zone requirement of at least 10 metres, clarify that contributions towards river restoration and de-culverting may be required where necessary, and encourage the naturalisation of river corridors to accord with paragraph 10.15.7.
- Policy ECC02A (new part): introduce a new criterion to require all applications for sites adjacent to a river corridor to be accompanied by an assessment of impacts (including cumulative impacts) of the development on the riverine environment and other matters to accord with paragraph 10.15.4.

106. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to: update and clarify the status of relevant current and potential future SPDs, and make clear that these contain guidance only. The changes should also delete from paragraph 10.9.3 the requirement for major schemes to be supported by SuDs Assessments, as these may be required for non-major development too; clarify that the documents reported at paragraph 10.13.6 provide guidance for flood risk assessment and state the number of site allocations outside flood zone 1 accurately; expand on the role of buffer zones for water courses at paragraph 10.15.3; explain how parts (d), (f) and (m) of the policy would be implemented regarding contributions towards off-site provision of flood defences, Catchment Partnership Management Plan projects and river restoration and de-culverting; and add further supporting text to make clear how Policy ECC02A(b)(i) should be applied.

107. Changes to Table 19 will also be required to reflect the above as follows; row 4 should be revised to encourage but not require pre-application engagement between potential developers and Thames Water and Affinity Water for all scales of development, and the element of that row about section 106 approvals with Thames Water should be deleted as it is illogical. Furthermore, Table 20 should be deleted, as it ineffectively repeats parts but not all of Policy SI2 of the London Plan and part (l) as modified would refer to Policy SI2.

Policy ECC03 - Dealing with Waste

108. A MM for soundness and general conformity with the London Plan should include the following changes:

- Policy ECC03 (1st paragraph): amend by setting out that the Council encourages sustainable waste management in accordance with Policy SI7 of the London Plan and the North London Waste Plan.

- Policy ECC03 (parts a to e): delete, as the North London Waste Plan has been adopted, and these parts echo but do not comprehensively set out the relevant policies or context for waste management in the North London Waste Plan or at Policy SI7 of the London Plan.
- Policy ECC03 (part f): amend to reference the relevant parts of the North London Waste Plan more clearly in respect of Scratchwood Quarry (Site No 29).

109. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to paragraph 10.16.2 to reflect the adoption of the North London Waste Plan, and to paragraph 10.16.4 to explain the Plan's interactions with the North London Waste Plan in respect of the allocation of Scratchwood Quarry.

Policy ECC04 - Barnet's Parks and Open Spaces

110. A MM for soundness and general conformity with the London Plan should include the following changes:

- Policy ECC04 (part b, criteria i. and ii.): restructure to clarify where developers will be expected to make provision for new and/or improvements to the quality and accessibility of parks and open spaces. This should include the circumstances wherein contributions towards off-site provision rather than direct provision may be appropriate and set out management and maintenance expectations. In addition, it should also include the standards for sports pitches identified in the Barnet Open Space, Sports and Recreational Facilities Assessment; refer to London Plan Policy S4 in respect of the approach to play provision; clarify what is meant by 'natural green spaces'; and refer to playing fields as a form of open space.
- Policy ECC04 (part e): reword to reconcile with the Council's strategy to address deficiencies in and improve access to parks and open spaces, and to reflect that the evidence is not sufficiently up-to-date to justify a policy approach that permits release of existing open space for development other than that which supports its improvement.
- Policy ECC04 (new part): make clear that the Council intends to protect and enhance existing open spaces, as currently only specific forms of open space are given protection expressly.

111. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to paragraph 10.17.4 to refer to paragraph 98 of the Framework; paragraph 10.18.1 to accurately reflect the size of the proposed adjustments to the Green Belt and Metropolitan Open Land; paragraph 10.19.1 to clarify that the intention is for publicly accessible open space to be provided at Site No. 45 and not Local Green Space (as defined in national policy); paragraph 10.19.7 to set out the Council's aspirations for improvements more widely than just for the

regional park, which is addressed principally by Policy GSS13; ; paragraph 10.22.1 to highlight that accessibility improvements to the Welsh Harp Reservoir will need appropriate management arrangements to ensure its integrity as an Site of Special Scientific Interest is maintained (with associated changes to paragraph 2.6.2); paragraph 10.22.2 to clarify the roles and status of the current and proposed future SPDs; and add a new paragraph to explain the Council's approach in targeting areas of open space deficiency and clarify the role of Map 7 in that regard.

112. The MM should also include a commitment to immediate preparation of up-to-date evidence relating to park and open space requirements to inform the committed early review of the Plan.

Policy ECC05 - Green Belt and Metropolitan Open Land

113. A MM for soundness and general conformity with the London Plan should include the following changes:

- Policy ECC05 (part a, criterion i.): update the references to paragraphs of the Framework.
- Policy ECC05 (part a, criterion ii.): delete, as there is no evidence that development outside the Green Belt affects its openness in the terms of its definition in the Framework, and it conflicts with the Framework's approaches to assessing openness.

114. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach.

Policy ECC06 - Biodiversity

115. A MM for soundness and general conformity with the London Plan should include the following changes:

- Policy ECC06 (part b): revise to clarify that the current and proposed future Green Infrastructure SPDs constitute guidance only.
- Policy ECC06 (part c): amend to make clear that contributions may be sought towards the opportunities of the Green Grid Areas relevant to Barnet in respect of biodiversity.
- Policy ECC06 (part d): replace with wording to confirm that, at a minimum, biodiversity net gain should be provided in accordance with national policy, or legislation once it takes effect; and that compliance with Table 21 is required, unless legislation indicates otherwise.
- Policy ECC06 (part e): replace to make clear that it is encouraged that proposals meet the Urban Greening Factor target scores set out by Policy G5 of the London Plan and provide SUDs schemes that maximise biodiversity benefits.

- Policy ECC06 (2nd paragraph): revise wording to align with paragraph 180(a) of the Framework in respect of the approaches to significant harm to biodiversity.
- Policy ECC06 (final paragraph): amend to make clear that where necessary monitoring of biodiversity net gain may need to be secured by planning conditions or obligations as appropriate.

116. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to: update and explain the likely implications of the Environment Act 2021 and associated regulations in respect of matters such as biodiversity net gain and Local Nature Recovery Strategies; clearly reference the Green Grid Areas and opportunities specified in part (c) of the Policy ECC06 and signpost to the relevant parts of the All London Green Grid SPG; clarify the roles and status of the current and proposed future Green Infrastructure SPD; delete paragraph 10.26.12 as it inaccurately summarises the requirements of Policy CDH08; and reword paragraph 10.26.13 to make clear that Sites of Metropolitan Importance and Sites of Local Importance constitute Sites of Importance for Nature Conservation (SINCs) to align with paragraph 8.6.1 of the London Plan. Furthermore, additional supporting text is required to refer to the Green Chains proposed to be taken forward from the current policies map, and to clearly identify the other green infrastructure referenced in the evidence base that form components of local wild-life rich habitats and wider ecological networks, in order to accord with paragraph 179 of the Framework. Consequential changes to the Policies Map will also need to be made.

117. In addition, Table 21 should be amended to separate the requirements for the submission of ecological assessments and statements regarding biodiversity net gain. Furthermore, clarity is needed that the ecological assessments would only be required where there may be an adverse impact on habitats and wildlife and/or it is required by legislation or associated regulations. The second paragraph of the first row also requires amending to clarify that the Council's preference is for biodiversity net gain to be provided on site, and that delivery of such off-site may be secured where necessary. The second row about biodiversity net gain monitoring should be also updated to reflect the changes to the final paragraph of the policy.

Policy TRC01 - Sustainable and Active Travel

118. A MM for soundness and general conformity with the London Plan should include the following changes:

- Policy TRC01 (part b): provide an opening sentence to clarify the application of its following criteria.
- Policy TRC01 (part b, criterion i.): amend by deleting reference to the 'BLLTS' so it refers to Policy TRC02 only. In addition, clarify that proposals will be required to demonstrate that adequate provision is made for necessary transport infrastructure, and that development should not

compromise the implementation of necessary transport infrastructure projects.

- Policy TRC01 (part b, criterion ii.): reword to align with paragraph 111 of the Framework in respect of highway safety and road network impacts.
- Policy TRC01 (part b, criterion iv.): rephrase to make clear that orbital connectivity and public transport enhancements are sought.
- Policy TRC01 (part c): restructure to clearly set out the requirements for all development (including non-major schemes) to provide travel plans and transport assessments/statements where significant amounts of movement would be generated, to accord with paragraph 113 of the Framework.
- Policy TRC01 (part c, criterion iii.): amend to provide flexibility so that the documents referred to are not required in cases where there would clearly be no construction vehicle or servicing or delivery issues.

119. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to update references to existing and proposed SPDs, highlight that Vision Zero is described at paragraph 10.2.8 of the London Plan, and clarify that mitigation of highway safety and road network impacts may be sought through planning condition, obligations or agreements under Section 278 of the Highways Act 1980. Additionally, changes are needed to paragraphs 11.4.2, 11.4.3, 11.4.4 and 11.7.3 to reflect the status of works to Colindale Station, the WLO, Crossrail 2 and the Ultra Low Emission Zone. Furthermore, paragraphs 11.6.4 and 11.7.1 should be amended to accurately reflect the requirements of policies GSS13, ECC04 and CHW02.

Policy TRC02 - Transport Infrastructure

120. A MM for soundness and general conformity with the London Plan should include the following changes:

- Policy TRC02 (1st paragraph): delete reference to policies GSS09 and GSS11 as the transport infrastructure referred to within Policy TRC02 would have wider application than for land relevant to those policies.
- Policy TRC02 (part a): clarify that the Council will facilitate and support contributions to the delivery of the specified transport infrastructure.
- Policy TRC02 (part a, criterion ii.): revise so it is clear that the Brent Cross North bus station may be replaced, remodelled or improved.
- Policy TRC02 (part a, criteria iii. and iv.): update to reflect the current status of Colindale Station and the WLO.
- Policy TRC02 (part a, criterion v.): clarify that land at Oakleigh Road South is safeguarded for Crossrail 2.
- Policy TRC02 (part a, criterion vii.): amend so as to be consistent with the requirements of Policy GSS05.

- Policy TRC02 (part a, criterion viii.): move to the end of Policy TRC02 because it contains a consideration relevant to all other aspects of the policy.
- Policy TRC02 (new part c): to clarify that the Council will work with TfL and Network Rail to bring forward capacity improvements identified in the Strategic Transport Assessment.
- Policy TRC02 (new part d): to clarify the role of the IDP in relation to transport infrastructure monitoring. Notably, the changes must not require development proposals to provide infrastructure ‘in accordance’ with the IDP given that it is an evolving document and the infrastructure required to facilitate delivery of the growth identified across the Plan period should already be encapsulated by the Plan and its supporting documents.

121. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to paragraph 11.11.1 to align with the requirements of Policy TRC01; to explain the roles of and signpost to the relevant elements of the Long Term Transport Strategy 2020-2041, Strategic Transport Assessment, and IDP insofar as these relate to the requirements of Policy TRC02; to identify the different forms of infrastructure required by the different parts of the policy; to clarify where it is anticipated that developments will need to contribute to delivery either directly or by means of financial contributions; and to delete paragraph 11.10.2, which would be inconsistent with Policy TRC01(c)(iii) as modified.

Policy TRC03 - Parking Management

122. A MM for soundness and general conformity with the London Plan should include the following changes:

- Policy TRC03 (1st paragraph): clarify that the parking should be limited in accordance with the London Plan standards.
- Policy TRC03 (new part after part a): Explain that parking permits may be issued for development in CPZs in line with the maximum provision level that would be permissible for schemes by Table 23, taking account of any on-site provision and subject to any capacity for additional on-street parking.
- Policy TRC03 (part b): revise wording to set out that where new CPZs or alterations to existing CPZs are deemed necessary to make a development acceptable, contributions towards implementation and monitoring may be required; and delete the requirement for CPZs to be in place prior to the occupation of development, as the delivery of CPZs is outside the control of applicants.
- Policy TRC03 (part c): clarify the term ‘car free development’ by making certain that ‘where no parking would be provided within a development site, residential parking permits will be made available to Blue Badge Holders’, or similar wording.

- Policy TRC03 (part d): re-word to reflect Policies T6(L) and T6.3(G) of the London Plan regarding the re-provision of parking and parking for new retail development respectively as substantive evidence to justify an alternate approach has not been provided.
- Policy TRC03 (part f): references to electric vehicle charging should be updated to refer to the requirements of Part S of the Building Regulations. Similar consequential changes should be made elsewhere in the Plan.
- Policy TRC03 (part g): clarify that car club parking spaces with active charging facilities are encouraged as an alternative to private parking for residents (in accordance with Policy T6.1 of the London Plan) and if provided count towards the maximum provision calculated by the parking standards.
- Policy TRC03 (new part): wording to explain that parking statements or transport statements/assessments as appropriate should be provided with proposals to assess appropriate provision levels and any capacity for proposed on-street parking.

123. The listed changes to the policy set out above, will require consequential changes to be included in the MM to paragraphs 11.12.1 to 11.12.10 of the supporting text and Table 23, together with other related supporting text in the Plan to ensure a consistent approach. This includes, but is not limited to, necessary changes to delete from the supporting text indications that there may be flexibility in the application of the parking standards, which is not justified by firm local evidence, except for the early phases of large scale schemes where the overall quantum would not exceed the parking standards; make clear that the parking standards are maximums; make clear that although not a requirement of all development - in some cases, the Council may seek to ensure new or updated CPZs become effective prior to the occupation of proposed development where unacceptable impacts on local highway conditions would otherwise result; and clarify the criteria by which parking assessments and on-street parking capacity will be assessed.

124. Additionally, references to orbital PTAL and orbital connectivity should be deleted, as support for such approaches is not underpinned by substantive evidence, the methodology for calculating such is unclear, the infrastructure required to facilitate growth anticipated throughout the Plan period would be secured by Policy TRC02, and Policy TRC01 as modified would highlight the Council's support in principle for enhanced orbital connectivity and public transport facilities. Furthermore, revision to Table 23 is needed, to make clear that PTAL5 and PTAL6 areas should be car free as necessary for alignment with London Plan Table 10.3; and to delete the ^ footnote because clear evidence has not been provided that higher standards of provision would support additional family housing.

Policy TRC04 - Digital Communication and Connectivity

125. A MM for soundness and general conformity with the London Plan should include the following changes:

- Policy TRC04 (1st paragraph): add wording to make clear that the Council will support the delivery of digital connectivity infrastructure with a particular focus on areas with gaps in connectivity and barriers to digital access as set out in London Plan Policy SI6(B).
- Policy TRC04 (criterion i.): revise wording to align with Policy CDH08 and the Framework in respect of heritage assets.
- Policy TRC04 (criterion v.): resolve the overlapping references to setting.

126. The listed changes to the policy set out above, will require consequential changes to supporting text in the Plan to be included in the MM to ensure a consistent approach. This includes, but is not limited to, necessary changes to clarify the Council's aims in respect of CCTV provision and refer to the requirements of proposals as identified in Policy SI6 of the London Plan.

Delivering the Local Plan (including Table 24)

127. For effectiveness, a MM is required to cross refer to Policy DF1 of the London Plan relating to delivery of the Local Plan. This should include reference to planning obligations based on paragraphs 12.6.4 as proposed to be amended by EXAM68 and 12.6.5 to specify that the Council intends to prepare a new Planning Obligations SPD, and that both the current and potential new version of the SPD offer guidance only. The other policies in the Plan should then refer to this new policy, rather than the SPDs.

128. A further MM is required to the remaining text in Chapter 12, to reflect the above. The MM should also include further changes including to: make clear that where it has been demonstrated that planning obligations cannot viably be supported by a specific development, obligations should be prioritised in accordance with Part D of London Plan Policy DF1; clarify the roles and interactions between and potential uses of planning contributions, CIL funds and the Council's Infrastructure Payments Policy, and outline potential other sources of funding; reword paragraph 12.2.2 to reflect the status of the Plan once adopted; update paragraphs 12.4.1 and 12.5.1 to reflect that the CIL Charging Schedule has been adopted; refer to paragraphs 67 and 68 of the Framework at paragraphs 12.6.3 and 12.8.1 respectively; and ensure that the list of considerations that may require planning obligations at paragraph 12.6.4 is comprehensive and accurately reflects the other policies in the Plan.

129. A MM is also required to Table 24 to provide additional monitoring indicators, performance triggers and actions (including where necessary bringing forward the timetable for a partial or full review of the Plan). The MM should include changes to reflect the MMs to other parts of the Plan and new indicators as set out below:

- the number of new jobs arising from development (Policy GSS01);
- the number of new homes per annum delivered on small sites of 0.25 ha and below (Policy GSS01);
- annual delivery of self-build and custom housebuilding (Policy GSS01);
- the delivery of retail and other main town centre uses in Barnet's Town Centres and planning permissions granted in edge of centre and out of centre locations (Policies GSS08 and TOW01);
- progress on delivery of destination hubs and the regional park (Policy GSS13), and;
- applications received and granted for provision of pitches for Gypsies and Travellers and plots for Travelling Showpeople (Policy HOU07).

Appendix B - Acronym Buster and Glossary

130. Revise the definition of 'large scale' to 'large scale development' to reflect the terminology used throughout the rest of the Plan, and make clear the interaction with the use and definition of 'large-scale' in the London Plan and The Town and Country Planning (Mayor of London) Order 2008.

Appendix C - Replacement of Local Plan Policies

131. The Council should review Appendix B and C and the References (footnotes), for any consequential changes arising from MMs to the Policies and include any required amendments with the related MM.

Annex 1 - Schedule of Site Proposals

132. A MM is required to ensure that the Plan approach to deliverable and developable as set out in paragraph 16.1.4 is consistent with national policy. Taking account of those specific definitions and the associated site-specific evidence submitted during the Examination, the following MMs are required to achieve soundness of each of the following site allocations as submitted in the Plan (please note that consequential modifications will also be required to the summary table, the Borough Sites Map, the housing trajectory, and other related Policies of the Plan where indicative residential capacities and/or development timeframes are to be modified):

- Site No. 1 (Former Church Farm Leisure Centre): The site allocation is developable at the indicative capacity proposed in the Plan, but there is no evidence which demonstrates a realistic prospect of housing being delivered on site within five years. As such, a MM should include changes to the development timeframe to 6-10 years. The MM should also remove percentages for proposed uses to provide flexibility; clarify the need to consider the relationship with the surrounding historic environment; and confirm that archaeological assessment is required at application stage.
- Site No. 2 (North London Business Park): The MM should include changes to provide certainty that the indicative residential capacity contributing to housing supply in the Plan is 1,350 dwellings based on the extant hybrid planning permission (15/07932/OUT). The MM should also confirm that this

is a minimum and that the development timeframe is 0-5 years for 360 dwellings consistent with the detailed element of the permission, with the remainder in the developable supply. Furthermore, the MM should be clear that should any subsequent application proposal seek an uplift to the residential density within the allocation it would require demonstration of acceptability through a design-led approach in accordance with Policy D3 of the London Plan at application stage. In addition, the MM should also clarify the need for development to include greenspaces, pocket parks, walking and cycling routes and linkages.

- Site No. 3 (Osidge Lane Community Halls): The site allocation is developable at the indicative capacity identified in the Plan, but there is no clear evidence which demonstrates a realistic prospect of housing being delivered on site within five years. As such, a MM should include changes to the development timeframe to 6-10 years; together with removal of percentages for proposed uses to provide flexibility; and it should also clarify the need for the development to improve walking and cycling access to the primary school and Brunswick Park open space.
- Site No. 4 (Osidge Library & Health Centre): The site allocation is developable, but there is no evidence which demonstrates a realistic prospect of housing being delivered on site within five years. As such, a MM should include changes to the development timeframe to 6-10 years, together with a necessary reduction of the indicative residential capacity to 10 dwellings to be consistent with the most up-to-date calculations provided by the Council in EXAM75 and EXAM87. In addition, the MM should remove percentages for proposed uses to provide flexibility; and also clarify the need for the development to improve walking and cycling access to the primary school and Brunswick Park open space.
- Site No. 5 (Edgware Hospital): A MM should include changes to provide certainty that the indicative residential capacity contributing to housing supply in the Plan is 129 dwellings based on the extant planning permission (21/0274/OUT). The MM should also clarify that should any subsequent application proposal seek additional residential development within the allocation it would require demonstration of acceptability through a site-specific flood risk assessment and design-led approach, including application of the exception test to any parts of the site within Flood Zone 3a and avoidance of any development within the functional floodplain (Flood Zone 3b). The MM should also include removal of percentages for proposed uses to provide flexibility for delivery; explain the approach to tall buildings in a manner consistent with Policy CDH04; provide certainty of the site size consistent with the allocation boundary on the Policies Map and clarify the need for the development to ensure effective connectivity between the Strategic Walking network and access to the Silk Stream. There is no clear evidence that housing completions arising from the outline planning permission will begin on site within five years and therefore, the development timeframe should be identified as 6-10 years.
- Site No. 7 (Beacon Bingo): A MM should include changes to the site name for certainty to 'Bingo Hall Cricklewood'. It should also make changes to the indicative residential capacity contributing to developable housing supply in the Plan to reduce it to 77 dwellings based on calculations consistent with

- an associated necessary change to reclassify it within the 'Urban' density category of Figure 1 of Annex 1. The MM should also include removal of percentages for proposed uses to provide flexibility; and a revised approach to tall buildings consistent with Policy CDH04 and the relationship with the setting of the nearby Railway Terraces Conservation Area.
- Site No. 8 (Broadway Retail Park): A MM should include changes to provide certainty that the indicative residential capacity contributing to housing supply in the Plan is reduced to 583 dwellings based on calculations consistent with an associated necessary change to reclassify it within the 'Urban' density category. The MM should also clarify that the indicative residential capacity is a minimum and that should any subsequent application proposal seek an uplift within the allocation it would require demonstration of an acceptable design-led approach in accordance with Policy D3 of the London Plan. Whilst the site allocation is developable, as there is no clear evidence which demonstrates a realistic prospect of housing being delivered on site within five years, the MM should amend the development timeframe to 6-10 years. The MM should also include removal of percentages for proposed uses to provide flexibility; and provide an approach to tall buildings consistent with Policy CDH04 and the relationship with the setting of the nearby Railway Terraces Conservation Area.
 - Site No. 11 (KFC/Burger King Restaurant): A MM should provide certainty that the indicative residential capacity contributing to housing supply in the Plan is reduced to 102 dwellings based on calculations consistent with a necessary change to reclassify the allocation within the 'Urban' density category. In the interest of certainty, an associated change is required to confirm that the allocation lies within the Colindale Growth Area. In addition, whilst the site allocation is developable, there is no clear evidence which demonstrates a realistic prospect of housing being delivered on site within five years. The MM should, therefore, amend the development timeframe to 6-10 years. In addition, the MM should also include removal of percentages for proposed uses to provide flexibility; and make changes to the approach to tall buildings to ensure consistency with Policy CDH04.
 - Site No. 12 (McDonalds Restaurant): A MM should provide certainty that the indicative residential capacity contributing to housing supply in the Plan is reduced to 112 dwellings based on calculations consistent with a necessary change to reclassify it within the 'Urban' density category. In the interest of certainty, a change is also required to confirm that the allocation lies within the Colindale Growth Area. In addition, whilst the site allocation is developable, there is no clear evidence which demonstrates a realistic prospect of housing being delivered within five years. The MM should, therefore, amend the development timeframe to 6-10 years. The MM should also include removal of percentages for proposed uses to provide flexibility; and make changes to the approach to tall buildings to ensure that it is consistent with Policy CDH04.
 - Site No. 13 (Public Health England): The site allocation is developable. However, a MM is required to confirm that the indicative residential capacity contributing to housing supply in the Plan is reduced to 391 dwellings based on calculations consistent with a necessary change to reclassify the allocation within the 'Urban' density category and to account for flood risk

constraints upon the developable area. The MM should also include further changes to confirm that the allocation lies within the Colindale Growth Area, together with correction of the site size to 3.46ha. In addition, the MM should include removal of percentages for proposed uses to provide flexibility and explain the expected approach to flood risk, including the requirement for applications to demonstrate acceptability through a design-led approach (in accordance with Policy D3 of the London Plan) and exception test requirements for any parts of the site within Flood Zone 3a, together with the need for an alternative site access and avoidance of parts of the site within Flood Zone 3b. The MM should also add clarification of the requirement for development to ensure effective connectivity between the Strategic Walking network and access to the Silk Stream.

- Site No. 15 (Tesco Coppetts Centre): The site allocation is developable at the indicative capacity proposed in the Plan. However, a MM is required to remove percentages for proposed uses to provide flexibility and to clarify that as the site lies on the Strategic Walking network that development proposals should take opportunities to ensure effective connectivity thereto.
- Site No. 16 (45-69 East Barnet Rd): The site allocation is developable. However, a MM is required to confirm that the indicative residential capacity contributing to housing supply in the Plan is reduced to 75 dwellings for the reasons explained in the covering letter. The amendments in the MM should confirm that it is a minimum figure and that should any subsequent proposal seek an uplift to the residential capacity within the allocation it would require demonstration of acceptability through a design-led approach in accordance with Policy D3 of the London Plan at application stage. The MM should also make changes to remove percentages for proposed uses to provide flexibility and delete reference to Policy CDH04 as it is not within an identified suitable location for tall buildings following the requested MM to that policy.
- Site No. 18 (Former East Barnet library): The site allocation is developable at the indicative capacity proposed in the Plan, but there is no clear evidence which demonstrates a realistic prospect of housing being delivered on site within five years. As such, a MM should include changes to the development timeframe to 6-10 years. The MM should also make changes to remove percentages for proposed uses to provide flexibility and delete reference to Policy CDH04 as it is not within an identified suitable location for tall buildings following the requested MM to that policy.
- Site No. 20 (Fayer's Building Yard & Church): The site allocation is developable at the indicative residential capacity proposed in the Plan. However, a MM is required to remove percentages for proposed uses to provide necessary flexibility and delete reference to Policy CDH04 as it is not within an identified suitable location for tall buildings following the requested MM to that policy.
- Site No. 21 (New Barnet gasholder): The site allocation is developable. However, a MM is necessary to clarify that the indicative residential capacity of 201 dwellings is a minimum and that should any subsequent application proposal seek an uplift within the allocation it would require demonstration of an acceptable design-led approach in accordance with Policy D3 of the London Plan. The MM should also make changes to

- remove percentages for proposed uses to provide necessary flexibility to optimise residential development and ensure that the site requirements include incorporation of key footpath linkages.
- Site No. 22 (Sainsburys - New Barnet Town Centre): The site allocation is developable at the indicative capacity proposed, but a MM is required to remove percentages for proposed uses to provide flexibility and delete reference to Policy CDH04 as it is not within an identified suitable location for tall buildings following the requested MM to that policy.
 - Site No. 23 (Bobath Centre): The site allocation is deliverable based on the recent grant of full planning permission (21/2602/FUL) for 25 units which is consistent with the proposed site allocation. However, as there is no evidence before us that the planning permission has been implemented to date, a MM is required to make changes to confirm the relevance and status of the application. In addition, the MM should also remove the percentages for proposed uses to provide flexibility should any alternative application proposal come forward in the future.
 - Site No. 24 (East Finchley Station Car Park): The site allocation is developable at the indicative capacity proposed in the Plan, but a MM is required to remove percentages for proposed uses to provide flexibility and delete reference to Policy CDH04 as it is not within an identified suitable location for tall buildings following the requested MM to that policy. In addition, the MM should confirm an approach to car parking consistent with Policies GSS12 and TRC03 in the site requirements and development guidelines. It should also add the requirement to preserve or enhance the setting of the adjacent Grade II listed station building, whilst clarifying that proposals should seek to protect the existing community garden close to the allocation boundary or mitigate its loss through equivalent or improved provision accessible to the community.
 - Site No. 25 (East Finchley Substation): The site allocation is deliverable based on the recent grant of full planning permission (21/5217/FUL) on appeal for a mixed-use development including 9 residential flats. In that regard, a MM is required to provide certainty that the indicative residential capacity contributing to housing supply in the Plan is reduced to 9 dwellings and the development timeframe should be identified as 0-5 years. The MM should also clarify that this indicative residential capacity is a minimum and that should any alternative application proposal seek an uplift within the allocation it would require demonstration of acceptability through a designed approach in accordance with Policy D3 of the London Plan. In addition, the MM should remove percentages for proposed uses to provide flexibility should an alternative application proposal come forward and delete reference to Policy CDH04 as it is not within an identified suitable location for tall buildings following the requested MM to that policy.
 - Site No. 26 (Park House): The site allocation is developable, but there is no evidence of a realistic prospect of housing being delivered on site within five years. A MM is, therefore, required to change the development timeframe to 6-10 years and also to provide certainty that the indicative residential capacity contributing to housing supply in the Plan is reduced to 19 dwellings to be consistent with the most up-to-date calculations provided by the Council in EXAM75 and EXAM87. The MM should also include

- removal of percentages for proposed uses to provide necessary flexibility and delete reference to Policy CDH04 as it is not within an identified suitable location for tall buildings following the requested MM to that policy. In addition, the MM should clarify that any forthcoming application proposal should give consideration as part of a design-led approach to the integration with and enhancement of the entrance to Cherry Tree Wood.
- Site No. 27 (Edgware Town Centre): The site allocation is developable at the indicative residential capacity proposed in the Plan. Nonetheless, a MM is required to remove percentages for proposed uses to provide flexibility and to ensure certainty of the residential-led mixed use development that will be supported, including the necessary transport infrastructure and an approach to car parking that is consistent with Policies GSS12, TRC02 and TRC03. The MM should also clarify the approach to tall buildings in a manner consistent with Policy CDH04 and provide certainty that as the site lies on the Strategic Walking network that development proposals should take opportunities to ensure effective connectivity thereto.
 - Site No. 28 (Edgware Underground & Bus Stations): The site allocation is developable. However, a MM is required to provide certainty that the indicative residential capacity contributing to housing supply in the Plan is reduced to 2316 dwellings to be consistent with the most up-to-date calculation provided by the Council in EXAM75 and EXAM87. The MM should also remove percentages for proposed uses to provide necessary flexibility and ensure certainty of the residential-led mixed use development that will be supported, including the necessary transport infrastructure and an approach to car parking that is consistent with Policies GSS12, TRC02 and TRC03. The MM should also clarify the approach to tall buildings in a manner consistent with Policy CDH04 and provide certainty that as the site lies on the Strategic Walking network that development proposals should take opportunities to ensure effective connectivity thereto.
 - Site No. 30 (Finchley Central Station): A MM is required to provide the correct site address as Regents Park Road / Chaville Way / Nether Street / Station Road and Crescent Road and also clarify that it relates to land adjacent to the railway tracks and Finchley Central Station. The site allocation is developable at the indicative capacity proposed in the Plan, but the evidence provided has not sufficiently demonstrated a realistic prospect of any housing being delivered within five years in the absence of a planning permission and given the lead-in times involved for a development of 556 dwellings. The MM should remove percentages for proposed uses and provide certainty of the residential-led mixed use development that will be supported, including the necessary transport infrastructure and an approach to car parking that is consistent with Policies GSS12 and TRC03. The MM should also include certainty of the approach to tall buildings that is consistent with Policy CDH04 and clarify that as the site lies on the Strategic Walking network that development proposals should take opportunities to ensure effective connectivity thereto.
 - Site No. 31 (Brentmead Place): The evidence offered by the Council and landowner during the Examination sufficiently demonstrated that there is a realistic prospect of housing being delivered on site within five years at the indicative capacity identified in the Plan. However, a MM is required to

- delete reference to Policy CDH04 as it is not within an identified suitable location for tall buildings following the requested MM to that policy.
- Site No. 33 (Bunns Lane Car Park): The site allocation is developable at the indicative residential capacity proposed in the Plan, but a MM is required to remove percentages for proposed uses to provide necessary flexibility for any future application. The MM should also include an approach to car parking that is consistent with Policies GSS12 and TRC03.
 - Site No. 34 (Burroughs Gardens Car Park): The site allocation is developable for the indicative residential capacity of 9 dwellings proposed, but there is no evidence which demonstrates a realistic prospect of housing being delivered on site within five years. As such, a MM should include changes to the development timeframe to 6-10 years and provide an approach to car parking that is consistent with Policies GSS12 and TRC03.
 - Site No. 35 (Egerton Gardens Car Park): The site allocation is developable rather than deliverable as planning application (21/4709/FUL) and the recent revised application (23/2868/FUL) are undetermined at the present time. A MM is, therefore, required to provide certainty of the indicative residential capacity contributing to housing supply in the Plan of 25 residential units (including a ratio of 2.5 student rooms to 1 standard housing unit) based on those planning applications, and the 6-10 year timeframe. The MM should also remove the percentages for proposed uses to provide necessary flexibility for any future application.
 - Site No. 36 (Fenella): The site allocation is developable rather than deliverable as planning application (21/4709/FUL) and the recent revised application (23/2868/FUL) are undetermined at the present time. A MM is, therefore, required to provide certainty of the indicative residential capacity contributing to housing supply in the Plan of 65 residential units (including a ratio of 2.5 student rooms to 1 standard housing unit) based on those planning applications, and a 6-10 year development timeframe. The MM should also remove the percentages for proposed uses to provide necessary flexibility for any future application.
 - Site No. 38 (Ravensfield House): The site allocation is developable rather than deliverable as planning applications (21/4709/FUL) and the recent revised application (23/2868/FUL) are undetermined at the present time. A MM is, therefore, required to provide certainty of the indicative residential capacity contributing to housing supply in the Plan of 90 residential units (including a ratio of 2.5 student rooms to 1 standard housing unit) based on those planning applications, and a 6-10 year development timeframe. The MM should also remove the percentages for proposed uses to provide necessary flexibility for any future application.
 - Site No. 39 (The Burroughs Car Park): The site allocation is developable for the indicative residential capacity of 21 dwellings proposed, but there is no evidence which demonstrates a realistic prospect of housing being delivered on site within five years. As such, a MM should include changes to the development timeframe to 6-10 years. The MM should also provide an explanation of the approach to car parking that is consistent with Policies GSS12 and TRC03.

- Site No. 40 (Meritage Centre): The site allocation is developable rather than deliverable as planning application (21/4722/FUL) is undetermined at the present time. A MM is, therefore, required to provide certainty of the indicative residential capacity contributing to housing supply in the Plan of 73 residential units (including a ratio of 2.5 student rooms to 1 standard housing unit) based on the planning application, and a 6-10 year development timeframe. The MM should also remove the percentages for proposed uses to provide necessary flexibility for any future application.
- Site No. 41 (PDSA and Fuller Street Car Park): The site allocation is developable rather than deliverable as planning application (21/4722/FUL) is undetermined at the present time. A MM is, therefore, required to provide certainty of the indicative residential capacity contributing to housing supply in the Plan of 32 residential units (including a ratio of 2.5 student rooms to 1 standard housing unit) based on the planning application, and a 6-10 year development timeframe. The MM should also remove the percentages for proposed uses to provide necessary flexibility for any future application.
- Site No. 42 (Usher Hall): The site allocation is developable, but there is no evidence which demonstrates a realistic prospect of student housing being delivered on site within five years. A MM is, therefore, required to amend the development timeframe to 6-10 years. Furthermore, as set out in the covering letter, neither the indicative residential capacity identified in the Plan as submitted nor the Council's most up-to-date calculations in EXAM75 and EXAM87 reflect a realistic minimum figure. A MM is therefore, required to reduce the indicative residential capacity contributing to housing supply in the Plan to a minimum of 9 dwellings (equivalent to 23 student units) and it should clarify that any proposal seeking an uplift within the allocation is required to demonstrate an acceptable design-led approach in accordance with Policy D3 of the London Plan at application stage.
- Site No. 43 (Army Reserve Depot): The site allocation is developable at the indicative capacity in the Plan but there is no realistic prospect of housing being delivered within five years. As such, a MM should include changes to the development timeframe to 11-15 years taking account of the most up-to-date evidence. The MM should also include removal of percentages for proposed uses to provide necessary flexibility for any future application, and provide clarification in the site requirements and development guidelines that improvements to streets and public realm should be delivered in line with the Healthy Streets Approach.
- Site No. 44 (High Barnet Station): The site allocation is developable. However, the evidence provided has not sufficiently demonstrated a realistic prospect of any housing being delivered on site within five years in the absence of a planning permission and given the lead-in times involved in a residential-led development of at least 292 dwellings. In that regard, a MM is required to remove percentages for proposed uses and provide certainty of the residential-led mixed use development that will be supported, including the necessary transport infrastructure. This should include a requirement for a pedestrian footbridge over the railway line to Potters Lane if possible (otherwise a footway down the east side of Barnet Hill to the south of the station slip road) and an approach to car parking that is consistent with Policies GSS12 and TRC03. The MM should also delete

- reference to Policy CDH04 as it is not within an identified suitable location for tall buildings following the requested MM to that policy and given its topography relative to its surroundings.
- Site No. 45 (Land at Whalebones): The site allocation is developable. However, taking account of the previous refusal of planning permission (19/3949/FUL) and dismissal of the related appeal, together with the constraints of the site, it has not been demonstrated that there is a realistic prospect of housing being delivered on site within five years or at the total of 152 dwellings in the Plan as submitted. A MM is, therefore, required to provide certainty that the allocation relates to land adjacent to Whalebones, to amend the development timeframe to 6-10 years and correct the allocation size to 4.37 hectares. The MM should also provide certainty that the indicative residential capacity contributing to housing supply in the Plan is reduced to 100 dwellings which reflects a cautious approach consistent with the lower end of the range identified in EB_SoCG_20. The MM should also make clear that a design-led approach in accordance with Policy D3 of the London Plan will be necessary at application stage for a proposal for up to 100 dwellings or any uplift to that number to ensure that the development responds appropriately to the historic character of the site and its surroundings. In addition, the MM should remove percentages for proposed uses for necessary flexibility and provide certainty of the residential-led mixed use development that will be supported, including publicly accessible open space and community uses.
 - Site No. 46 (IBSA House): The site allocation is developable. However, the evidence provided has not sufficiently demonstrated a realistic prospect of any housing being delivered on site within five years as the full planning permission (19/6551/FUL) for 197 dwellings has yet to be issued due to prolonged negotiations relating to planning obligations. A MM, is, therefore, required to change the development timeframe to 6-10 years and it should also remove the reference to Mill Hill East being a Growth Area to ensure consistency with Policies GSS01 and GSS07, and Map 3E. In addition, the MM should clarify in the site requirements and development guidelines that footpath connectivity across the site will be required if any subsequent alternative proposal were to come forward during the Plan period.
 - Site No. 47 (Mill Hill East Station): The site allocation is developable for a minimum of 127 dwellings as proposed by the 11-15 year development timeframe. However, a MM is required to remove percentages for proposed uses and provide certainty of the residential-led mixed use development that will be supported, including the necessary transport infrastructure and an approach to car parking that is consistent with Policies GSS12, TRC02 and TRC03. The MM should also include additional clarification in the site requirements and development guidelines with respect to the design-led approach required to building heights in this location taking account of the locally listed station building. In addition, the MM should emphasise that comprehensive development of the site allocation with neighbouring sites is encouraged should they come forward to optimise density and delivery of housing, services and facilities for existing and future residents of Mill Hill East. The MM should also remove the reference to Mill Hill East being a Growth Area to ensure consistency with Policies GSS01 and GSS07, and

- Map 3E. Furthermore, the MM should provide certainty that as the site lies on the Strategic Walking network that development proposals should take opportunities to ensure effective connectivity thereto.
- Site No. 48 (Mill Hill Library): The site allocation is developable. However, it has not been demonstrated that there is a realistic prospect of housing being delivered within five years or at the total of 19 dwellings in the Plan as submitted. A MM is, therefore, required to amend the development timeframe to 6-10 years and reduce the indicative residential capacity contributing to housing supply in the Plan to a minimum of 10 dwellings. In that regard, the MM should also provide additional clarification that as the library is a locally listed building it should seek to retain the existing building, with any residential uses integrated via appropriate conversion and subservient extension as required. Taking account of the potential for the library use to be relocated elsewhere, the MM should also include removal of percentages for proposed uses to provide necessary flexibility.
 - Site No. 49 (Watchtower House & Kingdom Hall): The site allocation is deliverable based on the evidence including recent resolution to grant full planning permission (22/0649/FUL) for 184 units. A MM is, therefore, required to reduce the minimum indicative residential capacity to be consistent with the current proposal and to modify the development timeframe to 0-5 years. The MM should clarify that this indicative residential capacity is a minimum and that should any subsequent alternative application proposal seek an uplift within the allocation it would require demonstration of acceptability through a design-led approach in accordance with Policy D3 of the London Plan. The MM should also remove the reference to Mill Hill East being a Growth Area to ensure consistency with Policies GSS01 and GSS07, and Map 3E. In addition, the MM should make changes to remove percentages for proposed uses to provide flexibility should an alternative application proposal come forward. This, however, should be supplemented by necessary additional clarification in the MM of requirements associated with its location within the Green Belt and Mill Hill Conservation Area. This should include that the large open space to the west of the allocation will be expected to remain undeveloped and also confirm that opportunities should be explored to secure public access to the land from the existing footpath within the site and links into the Strategic Walking network. The MM should also remove the reference to Mill Hill being a Growth Area to ensure consistency with Policies GSS01 and GSS07, and Map 3E.
 - Site No. 50 (Watford Way & Bunns Lane): The site allocation is developable for an indicative residential capacity of 105 dwellings as proposed in the Plan when taking account of the potential for access from either Bunns Lane by travelling beneath the A1 Watford Way ‘flyover’, or through the garage site adjacent to 19-24 Farm House Court and/or from the adjacent Brancaster Drive development. However, a MM is necessary to specify those access options and to clarify the development timeframe as 11-15 years given the potential lead in times associated with facilitating a suitable access for residential development. The MM should also include confirmation that part of the site adjacent to the A1 may be required by TfL to support transport operations and that such a use must be carefully sited

- and designed to ensure a suitable living environment for new and existing housing. In addition, the MM should confirm that opportunities should be explored to ensure effective connectivity to the Strategic Walking network.
- Site No. 51 (Great North Road Local Centre): The site allocation is developable in the 6-10 years timeframe as proposed in the Plan. However, there is no realistic prospect of 84 dwellings being delivered within the allocation when taking account of the required retention of the existing Grade II listed cinema building and preservation of its significance and setting, including retention of the adjacent public house buildings where possible in accordance with Policy CHW04. A MM is, therefore, required to clarify those requirements on the development of the allocation and remove the percentages of proposed uses accordingly. The MM should also necessarily reduce the indicative residential capacity to a minimum of 27 dwellings given that the remainder of the site consists of a petrol station that is potentially capable of supporting a suitable redevelopment proposal as part of a design-led approach in accordance with Policy D3 of the London Plan and/or masterplan for the allocation.
 - Site No. 53 (Allum Way): The site allocation is developable. However, a MM is required to optimise the indicative development capacity for residential-led mixed use development by seeking a minimum of 599 dwellings within the allocation based on an Urban density classification. In that regard, the MM should emphasise the requirement for a design-led approach in accordance with Policy D3 of the London Plan and a development timeframe of 6-10 years. In addition, the MM should also confirm the need to safeguard station operations in line with agent of change principles, and that uplifts to the number of dwellings may be possible dependent upon TfL operational requirements and if train stabling is not required. Accordingly, the MM should also remove the percentages of proposed uses to provide the necessary flexibility for future proposals, specify an approach to car parking that is consistent with Policies GSS12 and TRC03, and taking account of local topography it should clarify the approach to tall buildings in a manner consistent with Policy CDH04.
 - Site No. 55 (Woodside Park Station East): The evidence offered by the Council and landowner during the Examination has sufficiently demonstrated that there is a realistic prospect of housing being delivered within five years at the minimum indicative capacity of 95 dwellings identified in the Plan. However, a MM is required to remove the percentages of proposed uses to provide the necessary flexibility for future proposals, specify an approach to car parking that is consistent with Policies GSS12 and TRC03, and delete reference to Policy CDH04 as it is not within an identified suitable location for tall buildings following the requested MM to that policy and given the need for a suitable relationship with surrounding properties.
 - Site No. 56 (Woodside Park Station West): The site allocation insofar as it relates to the southern parcel is deliverable in accordance with the planning permission for 86 dwellings (19/4293/FUL) which is under construction. However, the current constraints on the northern parcel as explained in the covering letter, necessitates a cautious approach to any uplift in the contribution to housing supply in the Plan beyond the existing planning

permission. In such circumstances, whilst the developability of the northern parcel cannot be ruled out, a MM is required to reduce the indicative residential capacity of the allocation to a minimum of 86 dwellings with any uplift dependent on a design-led approach for an appropriate development of the northern parcel that suitably overcomes the identified constraints. The MM should also confirm that the 6-10 years development timeframe for the northern parcel is dependent on that process and delete reference to Policy CDH04 as it is not within an identified suitable location for tall buildings following the requested MM to that policy and given the need for a suitable relationship with surrounding properties. The MM should also indicate that opportunities should be explored to ensure effective connectivity to the Strategic Walking network.

- Site No. 57 (309-319 Ballards Lane): The site allocation is developable. However, a Central density matrix classification in North Finchley is not consistent with the definition provided by Figure 1 of Annex 1 and the surrounding context. A MM is, therefore, required to reclassify the allocation as suitable for 'Urban' density and reduce the indicative residential capacity to 83 dwellings accordingly. The MM for this allocation (and others in North Finchley) should be clear that if further uplifts in dwelling numbers are proposed that they would be required to demonstrate acceptability via a design-led approach in accordance with Policy D3 of the London Plan. In addition, the MM should remove the percentages of proposed uses to provide the necessary flexibility for future residential-led mixed use proposals, and also ensure certainty of the approach to tall buildings in a manner consistent with Policy CDH04.
- Site No. 58 (811 High Road & Lodge Lane car park): The site allocation is developable for an indicative residential capacity of 132 dwellings as proposed in the Plan. However, it has not been demonstrated that there is a realistic prospect of housing being delivered within five years. A MM is, therefore, required to modify the development timeframe to 6-10 years. The MM should also remove the percentages of proposed uses to provide the necessary flexibility for residential-led mixed use proposals, specify an approach to car parking that is consistent with Policies GSS12 and TRC03, and ensure an approach to tall buildings consistent with Policy CDH04.
- Site No. 59 (Central House): The site allocation is developable. However, a Central density matrix classification in Finchley Central Town Centre is not consistent with the definition provided by Figure 1 of Annex 1 and the surrounding context. A MM is, therefore, required to reclassify the allocation as suitable for 'Urban' density and reduce the indicative residential capacity to a minimum of 42 dwellings when having regard to the principle established by a previously approved prior notification. Nonetheless, when taking account of the passage of time since the prior notification submission and that it was not implemented, it has not been demonstrated that there is a realistic prospect of housing being delivered within five years. It follows that the MM should also, therefore, amend the development timeframe to 6-10 years. In addition, the MM should remove the percentages of proposed uses to provide the necessary flexibility for residential-led mixed use proposals, ensure certainty of the site address and ensure an approach to tall buildings consistent with Policy CDH04. The MM should also

emphasise that should redevelopment rather than conversion be pursued, that a design-led approach should necessarily seek to preserve or enhance the settings of the Grade II listed cattle trough at the junction of Ballards Lane, and Finchley Church End Conservation Area.

- Site No. 60 (Finchley House): The site allocation is developable. However, a Central density matrix classification in North Finchley is not consistent with the definition provided by Figure 1 of Annex 1 and the surrounding context. A MM is, therefore, required to reclassify the allocation as suitable for 'Urban' density and reduce the indicative residential capacity to 128 dwellings accordingly. It also has not been demonstrated that there is a realistic prospect of housing being delivered within five years. It follows that the MM should also amend the development timeframe to 6-10 years. In addition, the MM should remove the percentages of proposed uses to provide the necessary flexibility for residential-led mixed use proposals and provide an approach to tall buildings consistent with Policy CDH04.
- Site No. 61 (Tally Ho Triangle): The site allocation is developable. However, a Central density matrix classification in North Finchley is not consistent with the definition provided by Figure 1 of Annex 1 and the surrounding context. A MM is, therefore, required to reclassify the allocation as suitable for 'Urban' density and reduce the indicative residential capacity to 205 dwellings accordingly. The MM should also remove the percentages of proposed uses to provide the necessary flexibility for residential-led mixed use proposals, whilst specifying an approach to car parking that is consistent with Policy TRC03, and tall buildings with Policy CDH04.
- Site No. 62 (Tesco Finchley): The site allocation is developable for an indicative residential capacity of 170 dwellings as proposed in the Plan. However, it has not been demonstrated that there is a realistic prospect of housing being delivered within five years. A MM is, therefore, required to modify the development timeframe to 6-10 years. The MM should also remove the percentages of proposed uses to provide the necessary flexibility for future residential-led mixed use proposals, specify an approach to car parking that is consistent with Policies GSS12 and TRC03, and an approach to tall buildings consistent with Policy CDH04.
- Site No. 63 (Philex House): The site allocation is developable. However, the indicative residential capacity of 48 dwellings in the Plan is unlikely to be achieved when taking account of the historic and architectural interest of the building which is more suitable for conversion than redevelopment. A MM is, therefore, required to reduce the indicative residential capacity to a minimum of 22 dwellings consistent with the most recent prior notification approval. Furthermore, taking into account that the approved prior notification was not implemented, it has not been demonstrated that there is a realistic prospect of housing being delivered on site within five years. It follows that the MM should also amend the development timeframe to 6-10 years. In addition, the MM should emphasise that should redevelopment rather than conversion be justified and pursued, that a design-led approach in accordance with Policy D3 of the London Plan will be required. In that context, the MM should also include changes to the site requirements and development guidelines to provide an approach to tall buildings that is consistent with Policy CDH04.

- Site No. 64 (774-776 High Road): The site allocation is developable. However, a Central density matrix classification in North Finchley is not consistent with the definition provided by Figure 1 of Annex 1 and the surrounding context. A MM is, therefore, required to reclassify the allocation as suitable for 'Urban' density and reduce the indicative residential capacity to 112 dwellings accordingly. The MM should also remove the percentages of proposed uses to provide the necessary flexibility for residential-led mixed use proposals and specify an approach to tall buildings that is consistent with Policy CDH04.
- Site No. 65 (Barnet Mortuary): The site allocation is deliverable based on the evidence including recent resolution to grant full planning permission for 60 dwellings. A MM is, therefore, required to increase the minimum indicative residential capacity to be consistent with the current proposal.
- Site No. 66 (East Wing - Key Site 4): The site allocation is developable. However, a Central density matrix classification in North Finchley is not consistent with the definition provided by Figure 1 of Annex 1 and the surrounding context. A MM is, therefore, required to reclassify the allocation as suitable for 'Urban' density and reduce the indicative residential capacity to 80 dwellings accordingly. The MM should also remove the percentages of proposed uses to provide the necessary flexibility for residential-led mixed use proposals and specify an approach to tall buildings that is consistent with Policy CDH04.
- Site No. 67 (Great North Leisure Park): The site allocation is developable for an indicative residential capacity of 352 dwellings as proposed in the Plan. However, to optimise the use of land and provide flexibility for any residential-led development that may come forward in the site, a MM should confirm that this is a minimum figure expected and that significant uplifts may be supported where acceptability is demonstrated via a design-led approach in accordance with Policy D3 of the London Plan. To reflect this, the MM should also remove the percentages of proposed uses to provide the necessary flexibility and clarify that a reduction in main town centre uses is sought; specify an approach to car parking that is consistent with Policies GSS12 and TRC03 and include an approach to tall buildings that is consistent with Policy CDH04. In addition, the MM should confirm that opportunities should be explored to ensure effective connectivity to the Strategic Walking network.

133. Finally, for the reasons set out in the covering letter, MMs are requested to delete the following site allocations from the Plan, together with any consequential changes to other parts of the Plan, the Policies Map and the housing trajectory:

- Site No. 6 (Watling Avenue car park & market).
- Site No. 9 (Colindeep Lane).
- Site No. 10 (Douglas Bader Park Estate).
- Site No. 14 (Sainsburys, The Hyde).
- Site No. 32 (Manor Park Road car park).
- Site No. 52 (Kingmaker House).
- Site No. 54 (Barnet House):

END OF APPENDIX