

# **September 2010 - LDF Core Strategy Representations for Direction of Travel & Council's Response & Recommendations**

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

Representor #	Representation	Initials	Surname	Body	Policy	Comments	Council's response	Council's proposed action
240	1			Universities Superannuation Scheme (USS)	CS1 Barnet's place shaping strategy	Drivers Jonas is instructed by Universities Superannuation Scheme (USS) to advise on planning matters in respect of its commercial assets at Finchley Industrial Centre and Capitol Park in Colindale. USS therefore has an active interest in the formulation of planning policy in the LB Barnet. The overarching vision promoted by the LB Barnet seeks to ensure that Barnet is known nationally and internationally as a successful city suburb, consistently secure new employment opportunities and make Barnet a place where people want to live and enjoy a high quality of life. A number of core objectives are outlined within the document to secure this aim. USS agrees with the council's objectives which seek to promote Barnet as a place of economic growth and prosperity and to ensure efficient use of land. In addition USS agrees with the council's three strands approach particularly strand 3 which seeks to achieve growth that is sustainable so as to achieve successful regeneration and high quality development. USS agrees with Policy CS 1 as it seeks to promote growth in Barnet and to provide opportunity for economic advancement.	We welcome this support	None
241	1	Ian	Dubber	Workspace Group PLC	CS1 Barnet's place shaping strategy	Workspace supports the planned economic growth in the west of the borough and the Opportunity and Intensification areas however this would not prevent development from being delivered in other locations within the borough. Such a rigid restriction would undermine the principles of PPS1 and PPS3 which promote sustainable communities. Furthermore such an approach would have a negative impact upon the property market in Barnet and could sterilise some areas and undermine housing delivery.	The Core Strategy clearly sets out the places where major growth is going to happen in the borough. However this does not preclude proposals for smaller growth coming forward outside these areas.	None
242	2	Peter	Storey	Friern Village Residents Association	CS1 Barnet's place shaping strategy	Growth must be limited and public transport infrastructure must be improved prior to any other building work. Provision must be given to providing community centres and parks. Green spaces must be a part of any new development.	Policy in the Core Strategy sets out what key transport infrastructure is going to be provided to support growth. The Infrastructure Delivery Plan sets out what, when, where and how it translates into delivery over the next 15 years including transport, community facilities and parks. It would be for TfL as the London wide strategic transport authority to review the entire proposed light rail scheme as it proposed to cross several London boroughs. We expect new development to make a contribution to the provision of open space.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

3 7 4	2		A2 Dominion Housing	CS1 Barnet's place shaping strategy	<p>Our client notes that the above section states that 'a new rail linked Waste Handling Recycling Facility to replace and significantly enhance the existing Hendon Waste Transfer Station facility is proposed on a site fronting Edgware Road (A5) and Geron Way. This will be secured in partnership with the North London Waste Authority whose existing Hendon Waste Transfer Station will close'. Furthermore, Preferred Policy CS 1 seeks to concentrate housing growth in well located areas that provide opportunities for growth. As such it is identified that the Council will focus major housing and economic growth in the most suitable locations and that the focus for housing and employment growth will be in the strategically identified North West London – Luton Coordination Corridor. Preferred Policy CS 1 states that Brent Cross – Cricklewood, along with Colindale and Mill Hill East are growth areas and the Key Diagram – Map2, identifies that the former Parcel Force Site on Edgware Road to be within this growth area.</p> <p>The former Parcelforce site is identified for residential-led redevelopment in the Brent Cross Cricklewood Regeneration Area Framework SPG (2005) and UDP policy, with a planning application currently under consideration for this type of development. The Core Strategy policy should reflect the adopted SPG, the UDP and the planning application for the regeneration area which now has a resolution to approve, with the provision of a building for business uses which would provide a buffer between the former Parcelforce site and the proposed Waste Handling Recycling Facility. The adopted SPG states that this adjacent building should be sensitively designed to minimise potential 'bad neighbour' relationships, with one façade designed to address the proposed waste handling facility and the other designed to suitably address the residential-led redevelopment of the former Parcelforce site. The policy and preamble should be amended to accurately reflect the adopted SPG and the planning application for the regeneration area which now has a resolution to approve.</p>	<p>The Core Strategy has been revised and a new policy on Brent Cross Cricklewood introduced in order to make clear that the planning framework for the area consists of the Core Strategy, London Plan, saved suite of UDP policies on Brent Cross Cricklewood and the Development Framework SPG.</p>	<p>New policy C2 on Brent Cross – Cricklewood</p>
3 7 9	4		Asda Stores Ltd	CS1 Barnet's place shaping strategy	<p>We support the Council's intention to enhance the existing centres within the Borough and fully agree that New Barnet should be listed as an existing centre which the Council aim to enhance.</p> <p>New Barnet is an identified centre that has suffered from decline in recent years. In accordance with national policy it is highly suitable for mixed use development and this should be encouraged to maintain and enhance the vitality and viability of the centre.</p> <p>Specific policy should be included that acknowledges that central site should bring forward very high density development in order to make the best use of accessible Brownfield sites, in line with Government guidance.</p>	<p>There are several brownfield site opportunities in and on the edge of New Barnet and it is important that we adopt an planned approach to such opportunities. The New Barnet Town Centre Framework is being developed to manage change in consultation with the community. PPS1 recommends that all those involved in the development process should aim for high quality and inclusive design. Density should not drive development; it is an important factor, along with the local context, design, transport and infrastructure. The Core Strategy clearly sets out that we seek high quality design that is appropriate to the growth being sought.</p>	<p>None</p>

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

404	2	Matthew	Thomas	Bride Hall Holdings Ltd	CS1 Barnet's place shaping strategy	Bride Hall is supportive of the Three Strands Approach that has been developed as the over-arching vision for planning, development and regeneration within the Borough. In particular, Bride Hall sees Strands Two and Three as issues that it can have a positive influence on through our interest in The Broadwalk Shopping Centre.	We welcome this support	None
404	3	Matthew	Thomas	Bride Hall Holdings Ltd	CS1 Barnet's place shaping strategy	Policy CS1 identifies Edgware Town Centre as a suitable location for major growth and an area that needs enhancement over the coming years. This approach is supported as The Broadwalk Centre in Edgware has the capacity to accommodate additional development consisting of a mix of retail, leisure and residential uses. Plans are now being prepared for a substantial extension to the store that will secure the vitality and viability of the Town Centre. It is important to ensure that any such proposals are capable of delivery and the initial plans contain a mix of uses that is yet to be finalised as demand for these uses is assessed. Therefore a flexible planning policy position for the Town Centre is supported to ensure that Edgware has the range of services that are suitable to its role as a Major Centre. Residential use is currently being considered as a component of the proposals, it is also considered, however, that the main function of the centre as a retail destination that serves the wider Edgware and Barnet area should be the primary development objective. It is therefore important that any inclusion of residential units as part of these proposals is entirely appropriate and does not compromise the primary function of the Broadwalk Centre.	The Site Allocations DPD is the appropriate document for site specific considerations alongside the Town Centre Framework. Residential is not recognised as a main town centre use. The Core Strategy supports residential as part of mixed use developments in town centres that contribute to their vitality and viability.	None
418	1	Julia	Hines	Age Concern	CS1 Barnet's place shaping strategy	We support the 3 Strands Approach	We welcome this support	None
427	1			Tesco Stores Ltd	CS1 Barnet's place shaping strategy	The policy should acknowledge that, in accordance with national and regional policy, promoting the vitality and viability of centres will in some cases mean growth and intensification. The Consultation Draft Replacement London Plan (October 2009) places a new emphasis on enhancing the Outer London economy by identifying and bringing forward capacity in and around town centres and enhancing town centres through higher density mixed use development. The policy refers to the enhancement of the "six largest town centres". To accord with PPS4 and the London Plan the policy should refer to promoting the vitality and viability of centres (as important places for communities) rather than 'enhancing'. This applies to all designated centres in the borough, not just the six largest town centres.	CS 1 represents our place shaping strategy. Our approach to town centre regeneration is clear and consistent with national policy and the revised draft London Plan. The Three Strands Approach sets a clear spatial agenda for Barnet whereby growth is complimented by protection and enhancement. Our approach to promoting town centres falls under the enhancement strand. The policy is in line with national and regional policy and there is no need to repeat what is said in the London Plan.	None
430	3	Dennis	Pepper	Barnet Borough Group London Wildlife Trust	CS1 Barnet's place shaping strategy	References throughout the document to the provision and use of Barnet's green/open/natural spaces show a worryingly narrow view. They should be protected, we are told, because they 'are important to the health of our residents' and because they 'provide opportunities for sport, recreation and play' (7.1.13). However, our 'natural' environment is not primarily a human plaything, though people may well enjoy the benefits that flow from it.	The greening of the built environment provides a significant contribution to climate change adaptation. The provision of green infrastructure is highlighted throughout the Core Strategy. We do recognise that not only people will be affected and have added references to green corridors, Blue Ribbon Network and Watling Chase Community Forest.	Revise section on open spaces to add references to Blue Ribbon Network, Watling Chase Community Forest and green corridors
431	3			Starfield Properties / St James Investments	CS1 Barnet's place shaping strategy	We concur with the enhancement of the six largest town centres, including the promotion of mixed-use developments	We welcome this support	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 3 6	2	Rober t	Newton		CS1 Barnet's place shaping strategy	Reason: The existing wording of Policy CS1 does not reflect Paragraph 2.3.1 and it should. Under the heading "Protection of" add to "Green Belt and Metropolitan Open Land that covers over one third of Barnet" the words "together with other valued open space to include parks, public and private playing fields, public and private amenity open spaces and the Borough's allotment sites" The heading "Enhancement of" should be changed to "Enhancement and Protection of" Under the heading "Enhancement and Protection of" Add to the first bullet point on Town Centres the words "within the existing town centre envelopes that will not be extended to include adjoining suburban houses." Add a new bullet point with the words "Barnet's suburban housing stock and suburban shopping parades." Amend the wording of Paragraphs 7.1.1 to 7.1.14 where necessary to reflect these changes to Policy CS1.	Policy CS1 has been revised to make it much clearer how it sets the spatial agenda and how the main place shaping policies sit within the Three Strands Approach. Through the Development Management policies we will establish town centre boundaries for major and district town centres.	None
4 3 7	1	P E	Pickering		CS1 Barnet's place shaping strategy	There are several other places where the Policy is weaker than the text paragraphs that support it. This is dangerous, since citizens relying on the text may be lulled into a false sense of security, though an Inspector on appeal would follow the Policy wording. The Council must harmonise the wording of all Policies with that of the supporting text. Policy CS1 This includes the words "Protection of Green Belt and Metropolitan Open Land . . ." Paragraph 2.3.1 however includes 'other valued open space' as well as 'Green Belt and Metropolitan Open Land'. 'Other valued open space' must be added in CS1.	The supporting text is more expansive because it sets the context for the policy. The text forms part of the development plan and is therefore a material consideration. Policy CS5 clearly sets out our approach to protecting open space.	None
4 3 9	2	Zenda	Green	Mill Hill Preservatio n Society	CS1 Barnet's place shaping strategy	Central to the Core Strategy is the Council's Three Strand Approach. Strand 1- Absolute protection of the Green Belt, Metropolitan Open Land and other open space from inappropriate development. We recognise that it is more important than ever to protect our Green Open Spaces and Green Belt Land especially with the demand for dwellings in Barnet. However Barnet Council need to be stronger about protecting the Conservation Area and vigilance in the Green Belt needs to be improved. We are concerned that Barnet Council will be unable to take swift action on the ever increasing number of encroachment, inappropriate and deviation from agreed planning applications, and with the lack of enforcement officers, Barnet presently seem to be unable to cope with the current amount of enforcement actions outstanding. We are also concerned within this strand what "inappropriate developments" actually means. Strand 2- Enhancement and protection of Barnet's suburbs, town centres and historic areas. Barnet's strengths as a successful suburb are underpinned by it's historic character, wealth and quality of green spaces, medium to low density housing, good public transport links and (reasonably good) community facilities. However with the projected increase in people living and working within Barnet this will change the character of the area forever. Mill Hill East is already losing green space to massive development. How can our suburbs be truly protected when their character is being eroded? Strand 3- Growth that is sustainable so as to achieve successful regeneration and high quality development. Mill Hill Preservation Society would argue that sustainable communities come with time. How are the increased population of Barnet expected to socially integrate so quickly? Sudden growth can break good community spirit. Where are the new facilities that will be required for the ever increasing Barnet population? Also Mill Hill Preservation Society needs clarity. The London Plan sets out the 2,500 new homes for Mill Hill East by 2026 (P2) and this	The Infrastructure Delivery Plan sets out what, when, where and how it translates into delivery over the next 15 years including transport, community facilities and parks. In the section on Making Barnet a Safer Place we highlight that community cohesion needs to be measured across the borough with a focus on growth areas such as Mill Hill East and the areas that surround them. The adopted AAP for Mill Hill East is in general conformity with the London Plan. Over its 15 year life span the area is expected to deliver 2,000 new homes.	Publish monitoring indicators in Appendix B. Our monitoring indicators will measure community cohesion.

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 3 9	3	Zenda	Green	Mill Hill Preservation Society	CS1 Barnet's place shaping strategy	This should place further emphasis on Barnet's existing historic and suburban character. Key growth areas, and in particular the Mill Hill East AAP, should acknowledge the impact that such a significant increase in density will have on the surrounding suburban character.	The Characterisation Study will help inform the protection of the suburban character with further policies identified in the Development Management DPD.	None
4 4 0	3			Brent Cross Cricklewood Development Partners	CS1 Barnet's place shaping strategy	Minor modifications are suggested to paragraph 7.1.7 to ensure consistency with the application as submitted including reference to 27,000 jobs rather than 20,000.	In the absence of an approved application for Brent Cross-Cricklewood the Core Strategy will retain reference to the targets in the existing London Plan.	None
4 4 0	4			Brent Cross Cricklewood Development Partners	CS1 Barnet's place shaping strategy	<p>The text box supporting Policy CS1 explains the nature of the BXC proposals. It is suggested that the text is revised to state :</p> <p><u>Resolution to grant an outline permission for the application which will establish a masterplan and framework for the comprehensive regeneration of the Brent Cross Cricklewood Area in accordance with relevant development plan policies was submitted in March 2008 approved in November 2009.....</u></p> <p><del>The application proposals</del> include approximately 7,550 housing units, of which 2,250 are <del>expected targeted, subject to tests of viability</del>, to be affordable.</p> <p>In addition the <del>application proposes proposals</del> involve the radical transformation as well as the approximate doubling in size of Brent Cross Shopping Centre, which will be focused on a new High Street which traverses the North Circular Road. ....</p> <p><del>This</del> <u>The High Street south of the North Circular Road will include new schools and comprise a mix of uses including community uses.....</u></p> <ul style="list-style-type: none"> <li>o <del>subject to feasibility studies</del>, a new Waste Handling Facility and Combined Heat and Power Plant are also proposed as part of Phase 1 and will provide a significant proportion of renewable on site energy generation;.....</li> <li>o <del>contributions toward</del> improvements to Brent Cross Underground and Cricklewood stations are proposed;</li> <li>o significant improvements to bus services in North West London including a new Rapid Transit Service between Cricklewood Station, Brent Cross Station and the new town centre shopping areas <del>with potential extension to other nearby tube stations such as Hendon Central</del> and.....</li> </ul> <p>Brent Cross - Cricklewood <del>will be expected to</del> be delivered over a twenty year timescale in seven phases. Phase 1 will include around 50% of the proposed new retail development focused on Brent Cross Shopping Centre which <del>in terms of viability</del> will provide..... Around 1,300 housing units will be provided in Phase 1. <u>The implementation of the development will depend on a number of factors including viability, phasing and delivery.</u></p>	We have revised this information box to reflect progress on the planning process and to support the introduction of a new strategic policy on Brent Cross - Cricklewood (CS2).	Revise information box on Brent Cross Cricklewood

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 4 1	5	Warren	Forsyth	Middlesex University	CS1 Barnet's place shaping strategy	<p>The University supports the regenerative development initiatives that form part of the Three Strands Approach, as identified in 7.1.7, and is keen to play a positive role, particularly in the Colindale growth area. There is a slight inaccuracy in the description of the Colindale proposals as currently set out, which the University suggests should be rectified. While existing Middlesex University halls of residence are within the Colindale Avenue Corridor of change, the proposal is to replace these and provide additional student accommodation in a new student village within the Aerodrome Road Corridor of Change. This will enable the existing halls site to be redeveloped for housing and mixed uses and to provide for necessary highway/junction arrangements. The new student village is proposed indicatively at the eastern end of the new Aerodrome Park where it would be easily accessible by foot or cycle from the Middlesex University Hendon campus.</p> <p>We suggest that the text describing the Colindale Avenue proposals be amended by replacing in the third sentence the words ".new student accommodation for Middlesex University..." by "...the relocation of Middlesex University student accommodation to the Aerodrome Road Corridor of Change...". There should also be a corresponding amendment to the text for Aerodrome Road. We suggest that the last sentence be amended to read "A new 5 ha Aerodrome Park will be provided, as will new commercial facilities along Aerodrome Road and a new student village for Middlesex University, to support consolidation and redevelopment of the Peel Centre."</p>	Agreed	Revise information box on Colindale to reflect existing and proposed student housing
4 4 2	3			British Library	CS1 Barnet's place shaping strategy	<p>The BL welcomes Barnet's place shaping strategy – 'The Three Strands' which includes the optimisation of opportunities for major development growth, through regeneration of previously developed land (paragraph 7.1.4). The BL is supportive of the strategy to focus development on previously developed land and Colindale's allocation as a 'growth area' within Policy CS1. The BL support the principles of Policy CS1 to "concentrate housing growth in well located areas that provide opportunities for growth, creating a sustainable quality environment that will have positive economic impacts on the deprived neighbourhoods that surround them."</p> <p>The BL site sits within the Colindale Avenue 'Corridor of Change' as identified in the CAAP. The BL site is in a particularly sustainable location being in such close proximity to the Colindale tube station and the bus services on Colindale Avenue. The site's housing allocation will help contribute to the delivery of 2,370 new homes between 2007 and 2021 in the Colindale Avenue area of change. This will go some way to the delivery of 10,000 new homes in Colindale as a whole over the CAAP period, helping to meet the Core Strategy's spatial vision objectives for the Borough. The BL welcome the acknowledgement of the Colindale growth area and reference to the CAAP in the Core Strategy.</p>	We welcome this support	None
4 4 6	7	Graham	Saunders	English Heritage	CS1 Barnet's place shaping strategy	<p>The wording of the Policy could be strengthened with regards to the enhancement of the Borough's historic environment. At present the Policy is disjointed and not sufficiently robust.</p> <p>In particular we would seek to ensure the protection and enhancement of the historic suburban environment of all Borough heritage assets. This includes conservation areas, listed buildings, registered historic parks and gardens and other buildings and spaces of local character importance.</p> <p>In addition the historic environment of the Borough's town centres should also be protected and enhanced.</p>	Agree amendment. The Core Strategy clearly sets out how the protection and enhancement strands will compliment growth. Barnet's heritage and historic environment will be enhanced and protected	Policy CS 1 has been revised to.

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 5 1	1			<p>HI (Brent Cross) Ltd</p> <p>CS1 Barnets place shaping strategy</p>	<p>Policy CS1, which seeks to promote housing and employment growth within Brent Cross Cricklewood highlights in the amplification and supporting text, that "The bridging of the North Circular road with a new Metropolitan scale sustainable town centre will create the heart and focus of activities at the 'hub' of Brent Cross Cricklewood." Whilst a resolution to grant consent for the outline application was made at the planning committee meeting on 19 November 2009, the precise detail of this bridge link is to be considered at the Reserved Matters stage. It is therefore considered, at this stage, that no commitment can be given to such link, as there is no formal planning permission to reasonably suggest that it can be delivered.</p> <p>The Core Strategy also refers to the Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework SPG, however, the supporting text for policy CS1 only refers to the outline application, which is yet to be granted formal planning permission, and therefore cannot be re As advocated in PPS12 'plans should be able to show how they will handle contingencies: it may not always be possible to have maximum certainty about the deliverability of the strategy. Authorities should not necessarily rely on a review of the plan as a means of handling uncertainty'. In these terms, there appears no alternative policy for the regeneration of the Brent Cross Cricklewood and West Hendon Area, should consent not be granted or the scheme fails to be delivered. In addition, reliance is placed on Supplementary Planning Guidance that was adopted in 2005. As acknowledged in PPS12 'Council's should not produce planning guidance other than SPD where guidance is intended to be used in decision making or the coordination of development.</p> <p>This could be construed as wishing to circumvent the provisions for consultation and sustainability appraisal'. The document has not been formulated on the basis of the most up to date background information, as is required for the Core Strategy, as such may soon, if it is not already become outdated. Therefore, the regeneration of the Brent Cross Cricklewood and West Hendon Regeneration Area should be brought forward by way of an Area Action Plan or Supplementary Planning Document, whereby mechanisms are in place under the LDF system for continual review, consultation and update as required.</p>	<p>The Core Strategy has been revised to reflect that proposals on Brent Cross Cricklewood are well advanced. With a new policy on Brent Cross Cricklewood we make it clear that the planning framework for the area consists of the Core Strategy, London Plan, saved suite of UDP policies on Brent Cross Cricklewood and the Development Framework SPG. The new policy is subject to specific indicators to reflect progress on implementation of proposals and infrastructure before 2015/16. If milestones are not delivered or are not capable of being delivered this will prompt a review of the Core Strategy</p>	<p>New policy C2 on Brent Cross – Cricklewood. and supporting text. Revise information box on Brent Cross - Cricklewood</p>
-------------	---	--	--	---	--	--	---

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 5 5	1 9	Mike	Dawson	Finchley Society	CS1 Barnet's place shaping strategy	<p>We agree that it is a better option to concentrate housing growth in well-located areas, so protecting the suburbs. Our concern is that the areas identified are being over-developed, and with too narrow a range of housing type (affordable) rather than with delivering a greater range and variety of accommodation. This position is exacerbated by allowing large-scale developments to hive-off required affordable housing to development sites, which already have such development. Too high a concentration of this type could be creating the ghettos of tomorrow.</p> <p>The scale of regeneration at Colindale cannot be called 'sustainable' when it is acknowledged that:</p> <p>"The wider strategic network (roads) in this part of London is congested, and there are a number of strategic constraints on Traffic levels and speeds which are beyond the scope of the AAP."</p> <p>You know there are problems, which will worsen, so you simply ignore them! You then plan overdevelopment by claiming travel within the area (of new housing) will be improved. Add to this the increased pressure from developing the A5 corridor and a truly unsustainable community is being developed. Knowingly creating sustainability problems for the surrounding area of Barnet cannot be a sound policy.</p> <p>Policy on protection of Green Belt and the suburbs is confused, depending on which document/section of Barnet's LDF you read. For example, Green Belt land will either get: 'Absolute protection or, 'protection from inappropriate development'</p> <p>Enhancement of the six largest town centres is welcomed. Retail space here needs to include shops that can found at Brent Cross to limit car use. What we see planned is a huge expansion of Brent Cross retail space that will threaten the viability of these six town centres. Again, confused policy plus denial of the impact of traffic/transport issues caused by residents distant to Brent Cross having to travel there.</p> <p>Policy CS 1, paragraph should be amended to read:</p> <p>The Council, along with its partners, will focus major housing and economic growth in the most suitable locations and manage it to ensure that we deliver sustainable development and infrastructure, while continuing to conserve and enhance the distinctiveness of Barnet as a place to live work and visit.</p> <p>Policy CS 1, add new paragraph to read:</p> <p>Growth will be maintained to a level required by the London Plan but not exceeded. Sustainability appraisals will include a test of the impact of development on surrounding areas, to include the local road network and infrastructure</p>	<p>With supporting infrastructure development can be sustainable so therefore no change to policy is necessary. Our two adopted AAPs for Colindale and Mill Hill East have demonstrated that it can be delivered.</p> <p>There is no confusion on policy protection of the Green Belt. For clarification please see national planning policy guidance (PPG) note 2 on Green Belts.</p> <p>Brent Cross and its impact on Barnet's Town Centres were considered as part of the planning application which the council resolved to approve subject to S106 in November 2009</p> <p>The housing target in the Core Strategy is lower than that of the revised draft London Plan and this presents a challenge for Barnet. Further clarification on the 15 year housing target is provided at paragraph 7.1.10</p>	None
4 5 6	2	Patrick	Blake	Highways Agency	CS1 Barnet's place shaping strategy	<p>The HA is supportive of the Three Strands Approach which concentrates new development in the most accessible locations around public transport nodes and town centres where social and physical infrastructure is to be improved.</p> <p>However, it is recommended that development should be appropriately phased with infrastructure provision. This will help ensure that the development is in line with national guidance and hence PPS12 (2008).</p>	<p>We would welcome the Highways Agencies contribution to our Infrastructure Delivery Plan. We consider that the policy wording is clear that infrastructure is secured to support growth. The where, when, what and how is set out in the Infrastructure Delivery Plan.</p>	Publish Infrastructure Delivery Plan

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 5 7	1			HIGH Trust	CS1 Barnet's place shaping strategy	I support the approach outlined in Policy CS1 that seeks to concentrate new housing in well located areas. Encouraging growth towards well connected areas of the Borough is in accordance with the Governments approach of sustainable development and creating quality environments. Existing urban centres such as Whetstone are suitable areas to focus new development as they provide a range of services such as shopping and leisure facilities as well as access to jobs and the transport network. This approach would also facilitate the improvement of existing infrastructure, the benefits of which could trickle down to the least prosperous areas of the borough.	We welcome this support	None
4 6 4	2	David	Howard	Federation of Residents Associations in Barnet (FORAB)	CS1 Barnet's place shaping strategy	Barnet's document while purporting to be based on the Three Strands policy actually promotes Growth at the expense of Protection and Enhancement. References to the Three Strands policy appear to refer to later editions which water down the more prescriptive clauses of the original 22nd November 2004 version which is the only one approved by councillors at Cabinet.	The Three Strands approach sets a clear spatial agenda for Barnet. This place shaping strategy is integral to our Core Strategy which was approved by Cabinet on 21 October 2009.	None
4 6 5	3	marcus	dickinson		CS1 Barnet's place shaping strategy	More cycle friendly roads	The promotion of public transport, walking and cycling are all included within the section on providing effective and efficient travel.	None
4 6 6	3	A	Reid	Mount Anvil Plc	CS1 Barnet's place shaping strategy	The promotion of Finchley Central (Church End) as a location for high-density mixed-use development, as stated in CS1, is supported. The Core Strategy (8.31) stresses the optimisation of housing density. However, in town centre locations, with good public transport accessibility and good access to shops services and infrastructure, densities should be maximised in order to achieve other policies within the LDF.	We welcome this support	None
4 6 7	1	Pauline	McKinnell	Cricklewood Community Forum	CS1 Barnet's place shaping strategy	A small amount of growth would be acceptable but the growth envisaged in the Brent Cross - Cricklewood will completely change the character of our area. The Forum wants low rise housing, protection of all our green spaces, and no demolition of existing housing, leisure and community buildings. We want the Council to lead on this not multi-national developers	In November 2009 the Council resolved to grant planning permission for the Brent Cross Cricklewood application.	None
4 6 7	3	Pauline	McKinnell	Cricklewood Community Forum	CS1 Barnet's place shaping strategy	protection of all green spaces as essential to health of all Barnet residents.	We make clear links in the Core Strategy between health and provision of open spaces.	None
4 7 0	4			Government Office for London	CS1 Barnet's place shaping strategy	Barnet's three strands approach is clearly set out in Section 7. This is the heart of the spatial strategy and needs more detail and expansion. It would be helpful if the description of each of the sub-areas; Mill Hill East, Colindale and Brent Cross Cricklewood each contained information on anticipated delivery of jobs, homes, retail floorspace and any other key uses.	We welcome this support and agree to update the information boxes.	Revise information boxes on each of the growth areas
4 7 0	5			Government Office for London	CS1 Barnet's place shaping strategy	It would benefit Section 7 including Policy CS1 (Place Shaping Strategy) if the relevant thematic policies for each of the '3 Strands' could be identified and appropriately cross referenced, This would clarify how the policy is to be put into practice and help link the more spatial policies at the beginning of the document with the more thematic policies later in the document. These sub-area descriptions would benefit from individual maps to illustrate the text.	Agree	Revise CS 1 and add maps of the growth areas

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 7 1	2	David	Howard	New Barnet Community Association	CS1 Barnet's place shaping strategy	Policy CS1 states that New Barnet is one of the six largest town centres in Barnet. This is factually incorrect. New Barnet is in fact the smallest district town centre sited entirely within LB Barnet as measured by either number of units or total floor space. This is set out clearly in Appendix 2C of the GVA Grimley Town Centre Floor space Needs Assessment dated April 2009. In addition, New Barnet is identified in the London Plan as one of the smallest district centres in Greater London. We therefore wish the reference to New Barnet to be deleted from Policy CS1 and at section 7.1.10	Reference to New Barnet has been removed from CS 1 and supporting text. We consider that it no longer merits specific designation as a priority centre. Any proposed development should reflect the scale of the town centre and be guided by the emerging Town Centre Framework for New Barnet. This Framework provides the basis for managing change in New Barnet.	Revise CS 1 and supporting text
4 7 1	2 1	David	Howard	New Barnet Community Association	CS1 Barnet's place shaping strategy	Para 7.1.10 , 7.1.11 see New Barnet as a focus for commercial development and residential growth and acknowledge this will lead to a significant increase in travel demand. This is contrary to the successful suburbs, developments in character and other desirable phrases used elsewhere in the document. It is totally unacceptable to make blanket statements that infill developments and residential growth will take place along main thoroughfares. Selective infill may be acceptable but not demolition of existing streetscapes to replace them with more ugly blocks of flats. Delete reference to New Barnet	Agree. New Barnet is no longer promoted as a priority town centre. The major transport thoroughfares are no longer promoted in the Core Strategy. Proposals that come forward in New Barnet or along such routes will be considered primarily against saved policies in the UDP or their replacements in the Development Management Policies DPD.	Revise CS1 Key Diagram and CS3 to remove New Barnet as a priority centre and the major thoroughfares
4 7 1	2	David	Howard	New Barnet Community Association	CS1 Barnet's place shaping strategy	7.1.14 sets out what makes the suburbs successful so adopt these standards across the board using the 22/11/2004 version of the Three Strands Policy.	The Three Strands approach sets a clear spatial agenda for Barnet. This place shaping strategy is integral to our Core Strategy which was approved by Cabinet on 21 October 2009.	None
4 7 7	1	Andrew	Newby	Barnet Green Party	CS1 Barnet's place shaping strategy	Brent Cross should be dropped as a growth area. The existing shopping mall already creates too much congestion, pollution and greenhouse gases, while drawing people away from nearby community shopping areas such as Hendon, Temple Fortune and Golders Green. Those communities should be supported instead.	Brent Cross is London's only regional shopping centre and an area of strategic importance. Its regeneration is highlighted in the London Plan.	None
4 7 7	3	Andrew	Newby	Barnet Green Party	CS1 Barnet's place shaping strategy	I favour focussing development on existing town centres but would like to see attention also given to other town centres such as East Finchley, Hendon, Temple Fortune and Golders Green.	All centres are promoted in the policy and a clear hierarchy is set out in the text.	None
4 7 8	1	Steven	Deller		CS1 Barnet's place shaping strategy	The removal of Cricklewood from the Borough of Barnet. This policy is about outer London suburbs. It proves that it is inappropriate for inner city Cricklewood to remain in a borough that is completely alien in outlook and culture from the local community. The policy is for inappropriate overdevelopment in Cricklewood in order to protect the communities that reflect the suburban areas of the borough	Cricklewood is an integral part of Barnet and proposals for the regeneration of the area are well established at a borough and London level in the UDP and London Plan.	None
4 7 8	2	Steven	Deller		CS1 Barnet's place shaping strategy	This will translate as support these six at the expense of everybody else	These are priority town centres with the best opportunities for attracting commercial investment.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

480	1	Dorothy	Badrick	UKOSF	CS1 Barnet's place shaping strategy	<p>The plans for Brent Cross Redevelopment are a gross overdevelopment and are incompatible with the local area. The traffic proposals are nonsense and will not work. The rapid transit system, the bus, will just get stuck in the traffic. Why take down a mature and pleasant estate Whitefield, and replace it with rabbit hutches? The compensation package which will allow current home owners only enough to buy a part share in a lease of inferior accommodation is theft. If the regeneration works North London grinds to a halt and all our high streets turn into urban deserts. If it doesn't then you are building the slums of the future. Why did the possibility of a 140m chimney spewing out particulates only come to prominence at the planning meeting? which idiot decided that its ideal location was next to a primary school and a housing conservation area? Why have the developers ignored local opinion particularly regarding the plans for Clitterhouse playing fields which are incompatible with PPGs for MOL? What about the only green space in the centre of Cricklewood outside of B and Q which residents are desperate to retain?</p> <p>How on earth do the developers think that Claremont Road can take a third traffic lane when traffic already at rush hours is backed up to The Vale and beyond? A third Lane will exacerbate not alleviate the problems. What about our health? Has anyone checked air quality in the area which must break EU guidelines. Are you trying to asphyxiate us? Who picks up the public health bill? These proposals are completely unrealistic and not feasible.</p>	<p>These issues were considered as part of the Brent Cross – Cricklewood planning application which the council resolved to approve subject to S106 in November 2009</p>	None
480	2	Dorothy	Badrick	UKOSF	CS1 Barnet's place shaping strategy	<p>Since the appalling mess and costs that you have allowed to develop around Hendon Football Club site and see above for Clitterhouse Playing fields. Why do you not protect MOL and follow the PPGs ALL OVER THE BOROUGH not just where you already have a sufficiency of green space but in Cricklewood where it is so sorely needed. Stop overdevelopment, hands off our sports facilities. Since the loss of the Hendon Football Club facility where are our playing fields and our built sport facilities? Are you proud of your record of being the worst in the country for sport provision and one of the lowest spending boroughs on facilities for young people. Whilst protecting your more affluent areas you do it at the expense of the poorer arrears of the borough, you should be ashamed of the record.</p>	<p>The Core Strategy is a strategic document which clearly identifies sport facilities as part of the infrastructure requirement to support growth. We are preparing a playing pitch strategy which will follow Sport England's guidance and will guide future provision of and management of such facilities.</p>	None
480	3	Dorothy	Badrick	UKOSF	CS1 Barnet's place shaping strategy	<p>And what about Cricklewood steeped in local history. Another example of the north/ south divide in the borough. Why not John Laings first garden state, the Pennine Drive Estate a conservation area rather than the hell of bedsits you are allowing it to become. How much more traffic and people do you expect to cram into one of the most overcrowded areas of Barnet? Why should we take all the excess people and traffic? How about spreading it around a bit. How about approaches to limit growth in already overcrowded locations. Don't infill why not use Totteridge Common. Regeneration yes, overdevelopment no.</p>	<p>The Core Strategy is a borough wide document and we have identified those areas that have the greatest opportunities and are the most appropriate locations for growth.</p>	None
481	1	David	Dobbs		CS1 Barnet's place shaping strategy	<p>I disagree with the general approach of 'strategic' growth of these areas. Whilst agreeing that redevelopment is required, I do not agree that the growth is required. I believe that the primary focus should be on redevelopment of town centres.</p>	<p>The approach set out in the Core Strategy aims to ensure that the borough remains a successful suburb. The Core Strategy is required to address the challenges that we face as such a place. There are opportunities for growth and it is imperative that we manage this.</p>	None
481	2	David	Dobbs		CS1 Barnet's place shaping strategy	<p>I disagree to the extent that protection of the green belt will inevitably lead to an over development of residential housing in already crowded urban areas within the borough. Therefore I believe that the green areas should be subject to a limited development - these should be focused on eco-housing.</p>	<p>We are committed to protecting the Green Belt and that is enshrined in our place shaping strategy - the Three Strands Approach.</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

481	3	David	Dobbs		CS1 Barnet's place shaping strategy	I don't believe that mixed use development really works and the most recent developments at North Finchley were disastrous and clearly indicate that the vision was wrong. The conservation areas should be maintained as far as possible.	We consider that mixed use development does work and represents a sustainable use of land and a means of mitigating climate change.	None
483	1	Maria	Nash	Barnet Women's Design Group	CS1 Barnet's place shaping strategy	Local & Borough wide concerns have not been fully addressed yet. Environmental & disabled access has not been updated yet for the next 15 years. Policy from a women's concept has not been included, either from a mother who has several small children to elderly/disabled women. Particularly Brent Cross has only got the most minimum of standards in its planning, travel has not been addressed at all and the A406 is a health hazard with excessive vehicles having to sit for hours at the bottle neck now what will happen when there are several more thousand people living, working or visiting the area. The waste system has also not been fully addressed which would have a huge impact on local and borough travel. There is no West to East or East to West borough transport. It can only be achieved by changing several buses and no tube or train services for people on the North East of the Borough to get to Brent Cross or West Hendon	All new homes are required to be built to lifetime homes standards by the London Plan. This also includes a requirement for 10% of housing to be wheelchair accessible. In line with PPS12 we do not need to repeat this policy. The Mayor intends to produce SPG on the quality and design of housing developments. In providing quality homes and housing choice we support lifetime neighbourhoods and Building for Life Standards.	Publish Infrastructure Delivery Plan
483	2	Maria	Nash	Barnet Women's Design Group	CS1 Barnet's place shaping strategy	Policy has to be set in stone that no open land either public or private is not built on. With the increase of population over the years we require spaces to breath in, play in, exercise in and relax in.	The Core Strategy has to be flexible and capable of addressing changing circumstances. We set out a number of indicators to monitor its progress. Each policy in the Core Strategy will be monitored based on specific indicators and reported in the Annual Monitoring Report. This will provide clear evidence of policy delivery and a basis for review of the Core Strategy	Addition of monitoring indicators at Appendix B
483	3	Maria	Nash	Barnet Women's Design Group	CS1 Barnet's place shaping strategy	New Barnet is not a large town centre and the concerns of the local residents are being ignored. Democracy requires every ones voice to be heard and the majority to decide not the selected few who think that they know what everyone wants	Reference to New Barnet has been removed from CS 1 and supporting text. We consider that it no longer merits specific designation as a priority centre. Any proposed development should reflect the scale of the town centre and be guided by the emerging Town Centre Framework for New Barnet. This Framework provides the basis for managing change in New Barnet.	Revise CS 1 and supporting text
485	1	Robert	Shutler	Woodside Park Garden Suburb Residents Association	CS1 Barnet's place shaping strategy	Less growth in population	Barnet is an attractive place where people want to live. Population growth is inevitable.	None
485	2	Robert	Shutler	Woodside Park Garden Suburb Residents Association	CS1 Barnet's place shaping strategy	The edges of the green belt should not be subject to the same restrictive rules as the centre of the green belt	PPG 2 – Green Belts covers this issue and the Core Strategy supports PPG 2.	None
485	3	Robert	Shutler	Woodside Park Garden Suburb Residents Association	CS1 Barnet's place shaping strategy	Anyone prepared to invest in the High Streets, already ruined by the Council because of parking restrictions, should be welcome with open arms. Why restrict everything by stating mixed use?	These are priority town centres with the best opportunities for attracting commercial investment. We consider that mixed use development does work and represents a sustainable use of land and a means of mitigating climate change.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

487	2	Michael	Storey		CS1 Barnet's place shaping strategy	New Barnet is NOT a proper town centre - it doesn't even have a bank! I think that you are overstating its importance because you believe that New Barnet needs 'redeveloping' (i.e. pulling down - like Sainsbury's did on one side of the road) and replacing with uninspiring large-scale retail developments, complete with flats. Not only that, but to facilitate this, you intend to turn the A110 into a through road to accommodate the new supermarket(s). Residents don't want it, the politicians don't want it, the retail need isn't there and the train bridge won't allow it. You should be ashamed of yourselves. I am horrified that you want to allow major infill on the A110 (Cat Hill-Brookhill Road-East Barnet Road). This will utterly transform the character of Cat Hill irrevocably. I presume you're trying to encourage people to hurtle through New Barnet as fast as possible, because there won't be anything worth stopping to look at.	New Barnet has been identified as a district centre in the London Plan and its place within Barnet's network of town centres is clear. New Barnet is no longer promoted as a priority town centre. The major transport thoroughfares are no longer promoted in the Core Strategy. Proposals that come forward in New Barnet or along such routes will be considered primarily against saved policies in the UDP or their replacements in the Development Management Policies DPD.	Revise CS1 Key Diagram and CS3 to remove New Barnet as a priority centre and the major thoroughfares
488	13	Glen	Rollings	Greater London Authority	CS1 Barnet's place shaping strategy	This policy serves as a useful introductory objective that 'sets the scene' for Barnet's attitude to growth. It would be useful to add a section that relates to Barnet Council's desire to seek high-quality design that is appropriate to the growth being sought. Locations that have the potential for tall buildings should also be identified, in line with the Mayor's policies on tall and large-scale buildings.	Policy CS 1 has been updated accordingly. Para 7.1.17 refers to creative and innovative proposals in the growth areas and emphasises that schemes will be expected to enhance the qualities of its location and setting. As part of our LDF evidence base we are producing a Tall Buildings Study which supports guidance on assessing proposals for tall buildings. .	Amend Policy CS 5 to provide guidance on proposals for tall buildings
488	14	Glen	Rollings	Greater London Authority	CS1 Barnet's place shaping strategy	TFL would like to see the addition of a paragraph under Policy CS.1 which states "ensure that an appropriate level of transport capacity and accessibility is provided in advance of or concurrently with development demand" in accordance with London Plan policy 3C.1 Integrating transport and development and policy 6.3 Assessing transport in the Consolidated draft replacement London Plan (October 2009).	We have revised policy CS1 to add a reference to an appropriate level of transport provision.	Revise CS 1
488	15	Glen	Rollings	Greater London Authority	CS1 Barnet's place shaping strategy	TFL welcomes the reference to growth in accessible locations under paragraph 7.2.1; however TFL does not feel the statement that "car trips and road congestion will increase as development takes place in areas with poor public transport" is valid or appropriate and wishes to see it removed, however, if development is discouraged in areas with low PTAL then the above statement may not apply.	This is a reference to an alternative option identified and not pursued for the reasons set out in paragraph 7.2.1 of the Direction of Travel document.	None
	1	John	Dix		CS1 Barnet's place shaping strategy	Policy CS1 states that New Barnet is one of the six largest town centres in Barnet. This is factually incorrect. New Barnet is in fact the smallest district town centre sited entirely within LB Barnet as measured by either number of units or total floorspace. This is set out clearly in Appendix 2C of the GVA Grimley Town Centre Floorspace Needs Assessment dated April 2009 and which I have summarised in the table below. In addition, New Barnet is identified in the London Plan as one of the smallest district centres in Greater London. I therefore wish the reference to New Barnet to be deleted from Policy CS1 and at section 7.1.10.	See response at 471/2	Revise CS 1 and supporting text
P r o r m a				New Barnet	CS1 Barnet's place shaping strategy	Policy CS1 states that New Barnet is one of the six largest town centres in Barnet. This is factually incorrect. New Barnet is in fact the smallest district town centre sited entirely within LB Barnet as measured by either number of units or total floorspace. This is set out clearly in Appendix 2C of the BVA Grimley Town Centre Floorspace Needs Assessment dated April 2009. In addition, new Barnet is identified in the London Plan as one of the smallest district centres in Greater London. Recommendation made for references to New Barnet to be deleted from Policy CS1 and at section 7.1.10	See response at 471/2	Revise CS 1 and supporting text
P				Save our	CS1 Barnet's place shaping strategy	Save us from further high rise development, improve our failed housing estates	The Core Strategy aims to manage change and	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

2 4 1	2	Ian	Dubber	Workspace Group PLC	CS3 Distribution of growth (formerly CS2)	<p>Workspace supports the identification of strategic housing development sites but considers that development should be considered across the whole borough. In particular, this policy should promote mixed use developments on existing commercial sites. It is important that the Core Strategy is responsive in a positive manner to changing economic conditions and therefore development sites should be considered and encouraged on a site by site basis as they come forward for development.</p> <p>Workspace seeks to continue to provide good value small business units, in line with the key objectives of the London Plan. In order to do this, some of their premises will require regeneration and renewal to meet the modern and future needs of London's businesses. Such regeneration requires funding and Workspace proposes that if this is to be privately funded, a high value economic driver such as a residential use will be necessary to enable redevelopment and ensure the overall viability of regeneration.</p> <p>The benefits include the creation of modern business units, which can continue to be provided as good value rental accommodation whilst increasing the efficient use of urban land and delivery of housing through the provision of sustainable mixed-use development.</p>	<p>PPS4 recognises mixed use developments role in facilitating economic development. PPS4 also recommends at EC2(h) that we should where necessary safeguard land from other uses to facilitate a broad range of that economic development. PPS4 retains the requirement for an assessment of land. Barnet's Employment Land Survey provides evidence of the need for employment land.</p> <p>The Development Management Policies DPD will provide further detail on policy for existing employment sites in relation to mixed use.</p>	None
2 4 2	5	Peter	Storey	Friern Village Residents Association	CS3 Distribution of growth (formerly CS2)	<p>Housing density must be no higher than currently experienced in Barnet. People generally prefer to live in houses not flats above businesses.</p>	<p>The Core Strategy aims to make efficient use of previously developed land and therefore higher densities will be appropriate in accessible locations. We need to provide housing choice in meeting aspirations. In order to do that we have to provide a range of accommodation including flats. The housing mix is supported by the Strategic Housing Market Assessment.</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

2 4 4	2	Peter Hewitt		CS3 Distribution of growth (formerly CS2)	<p>What the above excerpts tell us residents of East and New Barnet is that if such LDF Core Strategy is adopted there will be little to prevent powerful commercial and construction interests from exploiting the [alleged] 'potential' as mentioned in S.8.1 above. The supermarket giants ASDA and TESCO who are fidgeting impatiently on the sidelines, along with the construction industry, so excited about the in-fill possibilities and eager to enjoy a share of the anticipated 'regeneration' bonanza. All will be jostling to transform the appearance and character of a supposedly moribund New Barnet along the entire 'major thoroughfare' [as designated in S.8] of East Barnet Road - Brookhill - Cat Hill. Few developers can be expected to heed the Core Strategy Direction of Travel's recommendation for higher density mixed-use development insofar as it purports to favour a balance of older Victorian/Edwardian properties and new, flatted residential units, the latter being rather more lucrative!</p> <p>In addition to which regard to the LDF Policy CS2 it would be very naïve and/or unrealistic indeed to expect Barnet's Town Planners to either reverse or to somehow remedy appalling vandalistic consequences incurred by TESCO acquiring and then so shamefully leaving derelict and unsightly so much residential and retail property in New Barnet. The suggestion that it is some kind of deliberate collusive arrangement between Barnet Council and TESCO, not to mention ASDA's Albert Road gas works site, is not at all without some justification.</p> <p>My objection therefore is that New Barnet should be regarded as a 'town centre' in the context of the LDF's Core Strategy document. In no way, except possibly having a Sainsbury's supermarket, can it be equated with such retail centres as Whetstone, North Finchley or Edgware etc. The fact that the A110 runs through New Barnet should not be the sole criteria for categorising it as such. Moreover, as will be commented on below at S.10 New Barnet has the same 'feel', 'atmosphere' and 'character' as East Barnet, more commonly referred to as 'The Village'. While the description of 'Village' may not wholly embrace New Barnet it is nevertheless not inappropriate to assert that both centres have co-existed and evolved as an integral outer suburban entity. Unquestionably this is how most residents in East and New Barnet have preferred to regard it.</p> <p>8.1.8 '...and having a character more appropriate to higher density mixed use development...such locations include the six town centres of...', one such being New Barnet</p> <p>8.1.9 Elaborates on 8.1.8 by referring to 'infill development estimated to have the potential to deliver a further 1,200 new homes'. Policy statement CS2 [applicable to S.8 informs the reader, inter alia, '...which will provide for residential uses above ground-floor level [for the six aforementioned town centres and along major transport routes] which include the A110.</p>	Reference to New Barnet has been removed from CS 3 and supporting text. We consider that it no longer merits specific designation as a priority centre. And is therefore not considered in the same way as North Finchley or Edgware. Any proposed development should reflect the scale of the town centre and be guided by the emerging Town Centre Framework for New Barnet. This Framework provides the basis for managing change in New Barnet. Major thoroughfares are no longer identified as having potential for infill housing development	Remove New Barnet from CS3 and supporting text
3 7 4	3		A2 Dominion Housing	CS3 Distribution of growth (formerly CS2)	<p>Our client notes that Preferred Policy CS 2 expects that in the range of 28,000 new homes will be provided within the lifetime of the Core Strategy between 2011/12 to 2026/27. Our client supports the focus of housing in the western side of the borough at Brent Cross – Cricklewood, Colindale and Mill Hill East, and particularly the approach that the Edgware Road is a sustainable location for major infill housing development. The regeneration of the western side of the Borough will lead to the revitalisation and successful growth of Barnet, which is a core element in achieving high quality housing growth and economic prosperity and should be brought forward immediately. CS2 should be amended to include reference to of the requirements of SPG and UDP policy which are effectively being rolled forward in this preferred policy.</p>	We welcome this support. The new policy CS2 on Brent Cross-Cricklewood provides a link with the Development Framework SPG and the saved policies of the UDP relating to the growth area.	Introduction of new policy CS2 on Brent Cross-Cricklewood

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

379	5			Asda Stores Ltd	CS3 Distribution of growth (formerly CS2)	As a highly accessible town centre, we agree that New Barnet represents a sustainable location for development within the Borough. In this context we support the promotion of new housing development within the centre of New Barnet. It is important that policy makes clear the need to progress town centre strategies swiftly in order to provide a framework for development.	In order to ensure that brownfield site opportunities are managed in the right way a Town Centre Framework for New Barnet has been developed to provide a strategy for the future of the town centres in consultation with the community.	None
379	6			Asda Stores Ltd	CS3 Distribution of growth (formerly CS2)	We welcome acknowledgment that the centre of New Barnet is identified as a location where residential development will be promoted. However, we are concerned that the provision of a figure for potential provision (1,200 by 2026/2027) amongst the various centres in the Borough could be used as ceiling figure to prejudice development. We request that this is clarified within the text.	The figure for town centres as set out in Table 2 and repeated in supporting text to CS3 provides an indication of capacity, it is not a target.	Revise supporting text to CS3
431	4			Starfield Properties / St James Investments	CS3 Distribution of growth (formerly CS2)	We concur with the promotion of the six largest town centres as the main focus of enhancement and infill housing development in parallel with the promotion of residential uses above ground level in town centres.	We welcome this support	None
436	3	Robert	Newton		CS3 Distribution of growth (formerly CS2)	Reason: The existing wording of Policy CS2 does not reflect Paragraph 2.3.1 and it should. Re-write the third paragraph of Policy CS2 to read: "We will also support the following locations with good access to public transport where the PTAL rating is 4 or above as the main focus for enhancement and infill housing development but will ensure that the density complies with and does not exceed the proposed new density matrix detailed in Policy 3.4, Table 3.2 and Paragraphs 3.22 to 3.25 of the London Plan Consultation Draft Replacement Plan (October 2009): And add to the first bullet point on town centres the words: "within the existing town centre envelopes that will not be extended to include adjoining suburban houses."	The draft revised London Plan is clear on the use of the density matrix and states that it is not appropriate to apply the table mechanically. There will be opportunities for higher density development within the upper range of the matrix in Barnet.	None
436	3	Robert	Newton		CS3 Distribution of growth (formerly CS2)	Delete the wording following the third bullet point and replace with: "In the limited number of areas where there is a dominance of flatted development as will be defined in the Site Allocation and Development Management Policy DPDs, whilst otherwise protecting and safeguarding suburban housing and shopping parades located along major transport and other important routes." In the introduction to the fourth paragraph of Policy CS2 after the words "We will" insert the words: "adopt Policy 3.5, Table 3.3 and Paragraphs 3.26 to 3.33 of the London Plan Consultation Draft Replacement Plan (October 2009) with regard to the quality and design of housing and space standards and....." Rewrite the fifth paragraph to read: "Our strategic approach on further development opportunity will be set within the context of the proposed new density matrix detailed in Policy 3.4, Table 3.2 and Paragraphs 3.22 to 3.25 of the London Plan Consultation Draft Replacement Plan (October 2009) to reflect local context, public transport accessibility and availability of social and other infrastructure. We will ensure that the density of any development complies with and does not exceed that set out in the proposed new density matrix and that developments comply with Policy 3.5, Table 3.3 and Paragraphs 3.26 to 3.33 of the London Plan Consultation Draft Replacement Plan (October 2009) with regard to the quality and design of housing and space standards."	PPS4 makes clear that residential is not a main town centre use. Major thoroughfares are no longer identified as having potential for infill housing development We are supportive of the Mayors approach to the quality and design of housing including the housing Density matrix and the new space standards in the draft revised London Plan. If the standards pass scrutiny and form part of the final London Plan they will replace the standards set out in the SPD on Sustainable Design and Construction.	Revise CS3 to remove major thoroughfares

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

						Amend the wording of Paragraphs 8.1.1 to 8.3.1 where necessary to reflect these changes to Policy CS2 and in particular rewrite the last sentence of Paragraph 8.3.1 to read: "We will utilise the proposed new density matrix detailed in Policy 3.4, Table 3.2 and Paragraphs 3.22 to 3.25 of the London Plan Consultation Draft Replacement Plan (October 2009) to reflect local context, public transport accessibility and availability of social and other infrastructure. We will ensure that the density of any development complies with and does not exceed that set out in the proposed new density matrix."		
437	2	P E	Pickering		CS3 Distribution of growth (formerly CS2)	The third bullet point, which advocates major housing development on main roads is unacceptable as it stands, and needs a lot of qualification. It will otherwise permit huge blocks of flats in totally inappropriate places. I suggest wording like 'Housing development will be appropriate on sections of major transport routes, but should always be in tune with the established character of the location'.	Major thoroughfares are no longer identified as having potential for infill housing development	Revise CS3 to remove major thoroughfares
440	5			Brent Cross Cricklewood Development Partners	CS3 Distribution of growth (formerly CS2)	Policy CS2 deals with the distribution of housing growth across the borough and suggests that BXC will accommodate 7,500 new homes. However, the application seeks permission for a defined quantum of residential floorspace that is estimated to deliver in the region of 7,550 dwellings, rather than a definitive residential unit figure. Also add Our strategic approach on further development within growth areas and opportunity sites will be set within the context of the density matrix in the existing London Plan. ..	Policy CS3 has been revised to clearly set out how growth will be delivered in the 15 year life span of the Core Strategy.	Revise CS 3
442	3			British Library	CS3 Distribution of growth (formerly CS2)	The BL understands that LB Barnet intend to focus growth in the strategically identified "North West London – Luton Coordination Corridor", specifically in the growth areas of Brent Cross – Cricklewood, Colindale and Mill Hill East. The BL supports the focus of growth in strategically identified areas as opposed to organic growth which may lead to piecemeal development. The BL support the allocation of 10,000 new homes in Colindale.	We welcome this support	None
446	8	Graham	Saunders	English Heritage	CS3 Distribution of growth (formerly CS2)	Support the approach of optimising densities as oppose to maximising them. In particular we are keen to ensure that when densities for a site are being established that the contextual qualities of the site and its surroundings in terms of local character and impact upon historic environment are being explicitly factored into the capacity of the site. This approach should be applied to all sites regardless of scale, location and nature of development.	We welcome this support	None
455	1	Mike	Dawson	Finchley Society	CS3 Distribution of growth (formerly CS2)	Barnet Council's Core Strategy, Direction of Travel (DoT), claims that, "It will embody spatial planning – the practice of 'place shaping' to deliver positive social, economic and environmental outcomes and provide the overarching local policy framework for delivering sustainable development in Barnet." To achieve sustainability you should first assess where development is possible and on what scale. Housing targets in Barnet's DoT are greater than those required by the Mayor of London and National Policy made on the basis of projected demand, not what is sustainable in the local community. Infrastructure to support expansion must first be in place, a condition set by Barnet Council in many policies including DoT. Like so many other ideas in the DoT, Barnet's proposed 'bond' to secure infrastructure remains only a proposal.	The Londonwide SHLAA assessed all potential housing sites in Barnet and looked at the likelihood of them coming forward and their potential housing yield. On the basis of this evidence housing targets were set for Barnet. An infrastructure delivery plan setting out the where, when, what and how of infrastructure delivery will accompany the publication version of the Core Strategy.	Publish Infrastructure Delivery Plan

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 5 5	3	Mike	Dawson	Finchley Society	CS3 Distribution of growth (formerly CS2)	DoT policies will together deliver negative social and environmental outcomes provided by an overarching local policy framework for delivering unsustainable development in Barnet. Working to give rise to increases in housing, planning huge expansion of out of town shopping while stating the most sustainable shopping is in Town Centres, will create an unsustainable and congested Barnet. Barnet's own target of 28,000 homes is some 25% above that required by the London Plan of 22,055 homes to be achieved by 2026.	The existing London Plan target runs to 2021 and the Core Strategy runs to 2026 which explains the apparent disparity. Further clarification on the 15 year housing target is provided in the supporting text for CS3.	Revise supporting text to CS3
4 5 5	7	Mike	Dawson	Finchley Society	CS3 Distribution of growth (formerly CS2)	There is a lack of evidence to support Barnet's figures for housing growth, how this is sustainable, particularly in terms of traffic congestion and how the required infrastructure will be provided. When commenting on Barnet's 'Issues and Options', it was a requirement of the Mayor of London that: "They should show how vision, objectives and strategy will be delivered And by whom. This includes the requirement for sound infrastructure planning including what physical, social and green infrastructure is needed to support the proposed level of growth; and identifies needs and costs, phasing of development, funding and responsibilities for delivery...", and considers: "Further work is required to reduce reliance on the car and increase cycling and on the transport implications of development." The required Infrastructure is not provided in DoT, and is required to be in place by the Mayor of London before this Core Strategy, DoT is acceptable.	We refer to our earlier responses at 455/3 and 455/1	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 5 5	1 5	Mike	Dawson	Finchley Society	CS3 Distribution of growth (formerly CS2)	<p>Mill Hill East We question that this site is suitable for so many new homes. The original AAP planned for 2,000 new homes giving a total of 2660 residential units that includes those already there.</p> <p>The current outline plan would give a total of 2906 homes, already a 10% increase on the AAP. This number could rise more in the final planning application. With work, retail and infrastructure space, the developer estimates an increase of 11,000 people in the area, which they estimate will mean 400 additional car journeys in the rush hour.</p> <p>We believe that the estimate of 400 additional car journeys in the rush hour is far too low. Approximately 50% of working people in Barnet travel by car. Assuming one in four of the new population of 8,500 people work, this equates to 1,125 car journeys during the rush hour. Local roads are already congested; at rush hour the roundabout at Kelly's Corner is already a particular problem. Northern Line or travel by car. Busses cannot significantly relieve pressure on public transport as the roads do not have bus lanes, resulting in busses having to use the congested/blocked roads during rush-hour.</p> <p>Instead of providing sustainable homes, the Mill Hill East AAP is based on putting as many homes as possible on a site, despite its poor public transport and congested local roads. Even though Regional and London plans have named this site as one with potential for development, Barnet's LDF should make its own realistic and sustainable plan and avoid creating traffic chaos to local and through-travellers.</p> <p>We note the comment in this item, that:          "in line with the London Plan target of 50% of housing provision being affordable the maximum amount of affordable housing will be sought having regard to this target and to a viability assessment"</p> <p>Reference to '...a viability assessment...' is a clear sign that the 50% target for affordable housing will not nearly be met. As with so many recent major housing projects in Barnet, the Council/Developer fails to provide London Plan requirements for affordable housing. Previous large developments (50+ residential units) have seen affordable housing requirements well below those required by the London Plan, and all too often hived-off to another site. The same applies for social housing.</p> <p>In the LDF we hear much of mixed communities and avoiding the problems of segregated communities of the past. For Barnet the reality is somewhat different. Social/affordable housing numbers for new developments are lower than required by the London Plan and to maximise profits for the developer are often side-shifted to an alternative site.</p> <p>The plan for Mill Hill East puts what little affordable housing that is planned furthest away from public transport. Those who are most likely to need public transport as their only means of transport have to walk the furthest.</p>	<p>The opportunity to specifically comment on the growth in Mill Hill East was during the development of the Area Action Plan. The adopted AAP for Mill Hill East is in general conformity with the London Plan. Over its 15 year life span the area is expected to delivery 2,000 new homes.</p> <p>The boroughwide policy for affordable housing delivery is dependent on further evidence. Both viability at the sub regional strategic housing market assessment have informed policy in the Publication version. A viability assessment of affordable housing delivery is required by national Planning Policy Statement 3.</p>	None
-------------	--------	------	--------	------------------	---	--	--	------

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 5 5	1 6	Mike	Dawson	Finchley Society	CS3 Distribution of growth (formerly CS2)	<p>Colindale AAP</p> <p>As a part of the huge developments planned for the West of Barnet, Colindale will see 10,000 new homes by 2025. It is estimated that demand at Colindale Station will nearly double by 2021. No assessment is shown for how the Underground system will cope with passenger demand from Colindale, yet alone other stations on this public transport system where demand will increase by population growth, plus mode shift from the car.</p> <p>Meanwhile, Colindale's AAP, 3.5.8, states:</p> <p>"The wider strategic network (roads) in this part of London is congested, and there are a number of strategic constraints on traffic levels and speeds which are beyond the scope of the AAP."</p> <p>So that's okay then! Because the AAP accepts 'strategic problems' in road transport in this area it is simply ignored while housing development goes on unchecked. Improvements to connectivity within the area mean little as through-roads and the surrounding area have 'strategic problems'. Sustainability is not only mentioned far too much in DoT, its principals are also ignored far too often for the sake of growth.</p>	The opportunity to specifically comment on the growth in Colindale was during the development of the Area Action Plan.	None
4 5 5	1 7	Mike	Dawson	Finchley Society	CS3 Distribution of growth (formerly CS2)	<p>Brent Cross – Cricklewood:</p> <p>If a new truly sustainable town centre of that envisaged could be built without a huge increase (doubling) in the size of retail space at Brent Cross, it could be a positive move. Such a huge shopping centre will attract customers from within and outside the borough creating huge increases in traffic.</p> <p>We are told that housing Partnerships are developing with the North West London boroughs of Brent, Camden and Harrow. It is unfortunate that this Partnership does not extend to Brent Cross. Camden and Brent are against the plan, citing the threat to Town Centres and traffic congestion as the main reasons. Even before phase one starts we are told a 50% increase in Brent Cross retail will happen but that housing targets will be lowered.</p> <p>Again we see profit taking precedence over sustainability. The proposed affordable housing target is 33% below that required by the London Plan and seems likely to fall more as profit wins over policy, be it for mixed communities, sustainability or In 'later phases' we are told a small library, replacement Leisure Centre and new rail freight facility will be built. What happened to the policy of 'Infrastructure' before development?</p> <p>Even if the waste handling/combined heat and power plant is built, this means the majority of waste will arrive by road in a network that Barnet Council states currently suffers from blockages, particularly around the A.406. Barnet Council estimates 29,000 extra car journeys a day to this already congested area.</p> <p>Camden and Brent council have unanimously voted against the development due to the traffic, lack of clarity in the plans and the impact on local high streets. Barnet's own Town Centres will also suffer from an expanded Brent Cross.</p>	These issues were considered as part of the Brent Cross Cricklewood planning application considered by committee on 16 November 2009.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 5 5	2 0	Mike	Dawson	Finchley Society	CS3 Distribution of growth (formerly CS2)	Roads that are believed to be suitable for higher density homes include: "Further opportunities for higher density residential development of appropriate scale and mass will be identified on the major thoroughfares of... A504 (Hendon Lane..." Hendon Lane has been quoted as being unacceptable development that should not be allowed to happen elsewhere. It must therefore be wrong to select it a place for higher density development.	We have identified those major transport routes where we consider flatted development for smaller households is more appropriate than family homes. The major transport routes do not provide a good environment for families.	None
4 5 5	2 1	Mike	Dawson	Finchley Society	CS3 Distribution of growth (formerly CS2)	The claim that: "Central to our overall approach to adapting to Barnet's future growth is ensuring that it is managed in a sustainable way... that it protects and enhances our environment, heritage and quality of life" Is not supported by evidence. Too many new homes are proposed. Building a home to new standards of sustainability does not make the overall proposal sustainable. Proposals such as Colindale AAP ignore the evidence of a congested strategic road network while proclaiming an improved local road network for the AAP.	We refer to our earlier responses at 455/3 and 455/1 The Inspector examined the Colindale AAP and found it sound. It is therefore the most appropriate strategy for the regeneration of Colindale and is founded on a robust and credible evidence base.	None
4 5 5	2 3	Mike	Dawson	Finchley Society	CS3 Distribution of growth (formerly CS2)	Include the wording below in this policy: New housing in the identified development areas should only proceed if the area can sustain the prescribed level of growth. Where it is acknowledged that local infrastructure, be it roads, schools, etc, cannot support proposed housing increases the development should be reduced to a level that can be accommodated, or infrastructure improvements made to cater for the housing proposed. Policy CS 2 - Amend as below: We will also promote the following sustainable locations with good access to public transport (PTAL 3-6) as the main focus of enhancement and major infill housing development. Development must not 'canyonise' the highway and be in character with the area:	A requirement of PPS12 is that the strategy must be deliverable and based on sound infrastructure planning. The Infrastructure Delivery Plan sets out what physical, social, and green infrastructure is needed to enable and support the amount of development proposed for Barnet.	Publish Infrastructure Delivery Plan
4 6 2	4	MWG	Scott	Garden and Plant Centre Developments Ltd	CS3 Distribution of growth (formerly CS2)	It is difficult to believe that Barnet will exceed or meet its current housing target expressed in the Core Strategy as 20,055 new homes by 2016/17 in terms of these houses being affordable and, in a range of dwelling sizes and types of housing (i.e. including housing for large families) in a strategy wholly dependant on redeveloping existing areas (Brent Cross – Cricklewood, Colindale and Mill Hill East) at higher densities. Even assuming that it is possible to develop a range of larger units of accommodation at affordable prices in such high density developments, they are unlikely to be in the form of the suburban housing development with access to open space at ground floor level which is so important for families, and which is recognised in the Core Strategy as the attractive element of the suburbs in Barnet.	The Development Management Policies DPD will provide further detail on policy for housing mix and private amenity space. The Core Strategy clearly sets out a 15 year housing target of 28,000 units up to 2026. Our housing mix is informed by evidence from the SHMA on household types and is set out in supporting text to at CS4.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 6 4	8	David	Howard	Federation of Residents Associations in Barnet (FORAB)	CS3 Distribution of growth (formerly CS2)	The strategy is aiming to deliver a greater number of units than required by the existing London Plan and the draft revised London Plan. There is an obsession with delivering large numbers of flats to the detriment of quality. There are too many one and two bedroom rabbit hutches for hobbits often in high rise out of character large blocks and insufficient numbers of three and four bedroom family houses with gardens. The provision for affordable housing in a variety of tenures is weak.	The housing targets in the Core Strategy are lower than that of the draft London Plan and this presents a challenge for Barnet. Further clarification on the 15 year housing targets is provided in the supporting text to CS3. Our housing mix is informed by evidence from the SHMA on household types and is set out in supporting text to at CS4	Revise supporting text to CS3
4 6 7	4	Pauline	McKinnell	Cricklewood Community Forum	CS3 Distribution of growth (formerly CS2)	These areas are becoming congested with traffic which is destroying the enjoyment of life for residents along this corridor. We welcome new housing but residents should be listened to as they know how much and where it could be built to integrate with existing communities.	Development of Brent Cross Cricklewood has been subject to substantial community involvement.	None
4 6 7	5	Pauline	McKinnell	Cricklewood Community Forum	CS3 Distribution of growth (formerly CS2)	Traffic increase will need to be looked at along A5 already slow moving at rush hours. Don't know about the other areas.	Transport Assessments have been carried out for the three major regeneration and development areas in the borough, two of which have been adopted as Area Action Plans. The AAPs included proposals to improve road junctions.	None
4 6 7	6	Pauline	McKinnell	Cricklewood Community Forum	CS3 Distribution of growth (formerly CS2)	As long as the regeneration does really improve them i.e. no more ugly buildings. Again residents should be listened to. Don't think housing density should be optimised anywhere in the borough. Homes should be built that people want to live in. Also existing homes should be improved not knocked down and rebuilt. What a waste of resources.	Our housing mix is informed by evidence from the SHMA on household types and is set out in supporting text to CS4	None
4 7 0	6			Government Office for London	CS3 Distribution of growth (formerly CS2)	Policy CS2 (Distribution of Housing Growth) must be absolutely clear in setting out what the total housing target is and when, where and how housing will be delivered. We recommend that policy includes the following information; a) Total housing delivery target for plan period (15 years from date of adoption); b) Annualised housing target; c) Housing target broken down by key sites and by expected delivery period (0-5, 6-10, 11-15 years). d) Explanation of any shortfall between a) and c) above.	We have revised CS3 and supporting text to clearly set out the sources of the 28,000 units we expect to deliver within the lifetime of the Core Strategy and highlight that Barnet's capacity to deliver housing is finite	Revise CS3 and add new table 2 on targeted housing growth and windfalls
4 7 0	7			Government Office for London	CS3 Distribution of growth (formerly CS2)	Policy CS2 (Distribution of Housing Growth) and CS 7 (Providing Quality Homes) are both housing policies. It would be helpful if the structure of the Core strategy kept similar topics together.	Agree	Revise order of policies so that CS7 becomes CS 4
4 7 0	1 5			Government Office for London	CS3 Distribution of growth (formerly CS2)	Housing trajectory – explanation required as to why housing completions appears to fall to zero in 2015/16.	We have revised the trajectory to cover the lifetime of the Core Strategy	Revise housing trajectory

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

471	3	David	Howard	New Barnet Community Association	CS3 Distribution of growth (formerly CS2)	<p>Policy CS2 states that Barnet will promote the following sustainable locations with good access to public transport as the main focus of enhancement and major infill housing development. In the same policy it makes reference to the A110 East Barnet Road as one of these locations. The Barnet Characterisation Study states that in New Barnet, "There is an overall consistency of massing within the built form, with most residential units rising to two or three storeys at most". There is a significant risk that identifying East Barnet Road as a location for major infill housing development will put it in direct conflict with the evidence of the Characterisation Study.</p> <p>We therefore wish the reference to New Barnet or A110 East Barnet Road to be removed from Policy CS2 and from sections 7.1.11, 8.1.8 and 8.1.9</p>	Agree	Revise CS 3 and supporting text
471	18	David	Howard	New Barnet Community Association	CS3 Distribution of growth (formerly CS2)	Para 5.1.10. People in larger homes will always continue to under occupy when the only choice is new rabbit hutches for hobbits. Britain builds the smallest new homes in the developed world (see www.swingacat.info) we will be demolishing today's new homes within 30 years just as we are demolishing Graham Park and Stonegrove.	We are supportive of the Mayors approach to the quality and design of housing including the housing density matrix and the new space standards in the draft London Plan. If the standards pass scrutiny and form part of the final London Plan they will replace the standards set out in the SPD on Sustainable Design and Construction.	None
471	24	David	Howard	New Barnet Community Association	CS3 Distribution of growth (formerly CS2)	Para 8.1.8/9, 8.2.2 are too wide ranging and while some of the aspirations may apply to other town centres they do not apply to New Barnet and it should be excluded from the list	Agree	Revise CS 3 and supporting text
478	3	Steve n	Deller		CS3 Distribution of growth (formerly CS2)	In other words shove all the housing in areas that are unpopular with the Barnet establishment. Barnet is already too big and should be broken up as a borough. This is exactly what you haven't done with Cricklewood, where you plan to increase housing by 250% in an area that is totally bound by six lane motorways and with no real plans for any meaningful infrastructure	The strategic growth corridor on the western side of the borough is the product of joint working with Camden, Brent and Harrow as well as the GLA and Luton and Watford Councils. This work will help build the case for investment in transport and social infrastructure to support growth.	None
481	4	David	Dobbs		CS3 Distribution of growth (formerly CS2)	Housing growth in this area should be promoted, but firstly there needs to be proper development to underpin these areas as desirable for families to live in. Currently this is not the case. House building should be considered after other developments to improve the community infrastructure in these areas.	An infrastructure delivery plan setting out the where, when, what and how of infrastructure delivery will accompany the publication version of the Core Strategy.	Publish Infrastructure Delivery Plan
481	5	David	Dobbs		CS3 Distribution of growth (formerly CS2)	Theses are areas already have a high density of buildings - further developments above ground floor level are not desirable (I refer again to the North Finchley development).	Please refer to our earlier response on mixed use development at 481/3	None
481	7	David	Dobbs		CS3 Distribution of growth (formerly CS2)	To optimise housing density from current levels to reflect these factors would require a baseline reduction in housing. The local infrastructure currently isn't suitable to meet the needs of the local population. Public transport and the NHS are already at levels in excess of safe capacity.	The approach on optimising density is clear in reflecting local context, public transport accessibility and social infrastructure. It does not start from current levels of housing.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

483	4	Maria	Nash	Barnet Women's Design Group	CS3 Distribution of growth (formerly CS2)	High rise dwellings are not required in Barnet, we are known as a green borough with family homes and spaces for children to grow up in. Skyscrapers are for offices in industrial areas or Dubai hotels not for raising families or housing the vulnerable elderly	The draft revised London Plan is clear on the use of the density matrix and states that it is not appropriate to apply the table mechanically. There will be opportunities for higher density development within the upper range of the matrix in Barnet. We will be guided in assessing any future proposals for tall buildings by a Tall Buildings Study which will follow advice by CABE/English Heritage.	None
483	5	Maria	Nash	Barnet Women's Design Group	CS3 Distribution of growth (formerly CS2)	The concerns of the local people are being ignored. Meaningful involvement is what is required. Not consultations were no matter what feedback we give you ignore it. We need more time to involve more people to get their views with many more inclusive methods so that disabled people could also have a say especially about transport	Consultation on the Direction of Travel included meetings and presentations to a wide variety of groups and stakeholders explaining what we were doing, why we were doing it and how they could get involved.	None
483	6	Maria	Nash	Barnet Women's Design Group	CS3 Distribution of growth (formerly CS2)	Why should people who are vulnerable - young, old, poor or disabled not have the opportunity to live in houses rather than high rise flats so that the developers can make money from council properties by putting more and more people on estates	We aim to provide housing choice that meets needs and aspirations of residents. The regeneration of housing estates will help provide decent homes.	None
483	7	Maria	Nash	Barnet Women's Design Group	CS3 Distribution of growth (formerly CS2)	To actually involve the people who live, work and visit Barnet on how many homes they want, where they want the homes and where they need hospitals. GPs surgeries etc. We have been asking for cross borough transport for ever and nothing has been done yet. Barnet won't allow double taxi card swipes nor does it have Capital Taxi scheme. Barnet's disabled & elderly people have to pay more than any other person living in London because of the lack of decent transport and Barnet's policy of ignoring vulnerable peoples needs	These are specific transport and operational issues that can be considered by the review of the Transport Local Implementation Plan.	None
485	4	Robert	Shutler	Woodside Park Garden Suburb Residents Association	CS3 Distribution of growth (formerly CS2)	The amount of housing and the increase in population being promoted is far too much and based on inaccurate figures in the first place. Everyone (except the Council it seems) knows that the 2001 Census was totally inaccurate.	Our approach is clear and consistent with national policy and the draft London Plan. The Three Strands Approach sets a clear spatial agenda for Barnet whereby growth is complimented by protection and enhancement.	None
485	5	Robert	Shutler	Woodside Park Garden Suburb Residents Association	CS3 Distribution of growth (formerly CS2)	Can you please have a decent standard of architecture and not the cheap and nasty stuff being designed at present.	This is a borough wide strategic document which is in accord with CABE advice on Planning for Places - Delivering Good Design Through Core Strategies.	None
487	4	Michael	Storey		CS3 Distribution of growth (formerly CS2)	In normal circumstances, I would support this statement, but I know you'll use it to shoehorn hundreds of unwanted 1- and 2-bed flats in New Barnet (something there was a surplus of even at the top of the property market) once you've finished shoeing in Tesco and their mob.	We refer to our earlier response at 487/2 on New Barnet.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

488	8	Glen	Rollings	Greater London Authority	CS3 Distribution of growth (formerly CS2)	Revision of housing targets in accordance with draft replacement London Plan. See comments on housing provision below.	We have updated the supporting text to CS 3 to highlight figures in the adopted and draft London Plan.	Revise CS3 supporting text
488	11	Glen	Rollings	Greater London Authority	CS3 Distribution of growth (formerly CS2)	TFL recommends that the Mill Hill East and Colindale boxes should include the statement "delivery of a fully accessible Underground station and improvements to bus, walking and cycling capacity in order to ensure that an appropriate level of transport capacity and accessibility is provided in advance of or concurrently with development demand", in accordance with London Plan policy 3C.1 Integrating transport and development and policy 6.1 of the Transport strategy in the Consolidated draft replacement London Plan (October 2009).	Additional text has been added to the Mill Hill East and Colindale boxes to clarify the range of improvements that are being sought in these areas. Additional text has also been added to the section on providing integrated and efficient travel.	Revise information boxes and CS9 supporting text
488	12	Glen	Rollings	Greater London Authority	CS3 Distribution of growth (formerly CS2)	TFL recommends that a reference be made to delivering step free access at Brent Cross Underground station.	Additional text has been added to the box. Additional text has also been added to the section on providing integrated and efficient travel.	Revise information boxes and CS9 supporting text
488	16	Glen	Rollings	Greater London Authority	CS3 Distribution of growth (formerly CS2)	The draft replacement London Plan sets targets for Brent Cross and Cricklewood to provide 10,000 new homes (although the site is partially within the London Borough of Brent), Colindale 12,500 homes, and Mill Hill East 2,100 homes in the period to 2031. The figures within the draft policy should be updated to reflect these.	We have updated paragraph 1.3.1 and 1.4.1 to highlight figures in the adopted and draft London Plan.	Amend paragraphs
488	17	Glen	Rollings	Greater London Authority	CS3 Distribution of growth (formerly CS2)	The density matrix should be used in conjunction with the public transport accessibility level, and its potential for future improvement. Additionally, density at any level should be design-led, and while it is correct to optimise rather than maximise, there will be instances where developments are appropriate within the upper end of the range. The explanatory text should be expanded to stress the importance of design and context.	We have revised the supporting text to highlight the importance of design and context	Revise supporting text to CS3
488	18	Glen	Rollings	Greater London Authority	CS3 Distribution of growth (formerly CS2)	TFL would like to see the addition of a paragraph under Policy CS.2 which states that LB Barnet will "ensure that a relative level of transport capacity and accessibility is provided in advance of or concurrently with development demand" in accordance with London Plan policy 3C.1 Integrating transport and development and policy 6.1 of the Transport strategy in the Consolidated draft replacement London Plan (October 2009).	We have revised policy CS1 to add a reference to an appropriate level of transport capacity and accessibility.	Revise CS1
488	28	Glen	Rollings	Greater London Authority	CS3 Distribution of growth (formerly CS2)	The housing figures should be updated to be in line with the draft replacement London Plan and draft revised Housing SPG.	See response at 488/16	Amend paragraphs
	2	John	Dix		CS3 Distribution of growth (formerly CS2)	Policy CS2 states that Barnet will promote the following sustainable locations with good access to public transport as the main focus of enhancement and major infill housing development. In the same policy it makes reference to the A110 East Barnet Road as one of these locations. The Barnet Characterisation Study states that in New Barnet, "There is an overall consistency of massing within the built form, with most residential units rising two or three storeys at most". There is a significant risk that identifying East Barnet Road as a location for major infill housing development will put it in direct conflict with the evidence of the Characterisation Study.	Major thoroughfares are no longer identified as having potential for infill housing development	Revise CS3 to remove major thoroughfares

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

	3	John	Dix		CS3 Distribution of growth (formerly CS2)	In addition, it is clear that the infrastructure in New Barnet cannot cope with additional infill properties. Local schools are full, and dependent on temporary classrooms to meet the current intake. It is exceptionally difficult to get an NHS dentist and doctors' lists are full. Over Christmas the problems arising from the lack of gas supply and the electricity cables burning out in Crescent Road due to excess demand illustrate how finely balanced the utilities network is already. Further infill housing will only serve to make power cuts a more frequent occurrence. A small residential development on the Albert Road Gasworks site, where new utility services could be specifically installed, would seem to offer a more practical solution. I therefore wish the reference to New Barnet or A110 East Barnet Road to be removed from Policy CS2 and from sections 7.1.11, 8.1.8 and 8.1.9.	Agree. The Albert Road site will be identified in our emerging Site Allocations DPD. Our Infrastructure Delivery Plan sets out the what, when, where and how of infrastructure delivery over the next 15 years.	Revise CS3 and supporting text
	4	John	Dix		CS3 Distribution of growth (formerly CS2)	In addition Policy C2 also identifies North London Business Park (NLBP) as a site for mixed use development including 400 new homes. This is the only Business Park in the borough and is a major centre for potential employment. In the new Draft London Plan, October 2009, this site is identified in Policy 2.17 as a Strategic Industrial Location (SIL) and detailed specifically in Annex A3.1 as an Industrial Business Park (IBP). Policy 2.17 specifically states that as part of LDF preparation Boroughs should: "identify SILs on Proposals Maps and develop local policies to protect their function, to enhance their attractiveness and competitiveness for industrial type activities including access improvements". I cannot see how a proposal for 400 homes on this site meets this requirement. I would therefore ask that North London Business Park is deleted from Policy CS2.	The Planning Brief for NLBP which promotes mixed use development was adopted in 2006 following public consultation and discussions with the GLA.	None
P r o f o r m a				New Barnet	CS3 Distribution of growth (formerly CS2)	Policy CS2 states that Barnet will promote the following sustainable locations with good access to public transport as the main focus of enhancement and major infill housing development. In the same policy it makes reference to the A110 East Barnet Road as one of these locations. The Barnet Characterisation Study states that in New Barnet, 'There is an overall consistency of massing within the built form, with most residential units rising to two or three storeys at most'. There is a significant risk that identifying East Barnet Road as a location for major infill housing development will put it in direct conflict with the evidence of the Characterisation Study. It is recommended that reference to New Barnet or A110 East Barnet Road to be removed from Policy CS2 and from sections 7.1.11, 8.1.8 and 8.1.9	Agree	Revise CS3 and supporting text

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

2 4 1	8	lan	Dubber	Workspace Group PLC	CS4 Quality homes and housing choice (formerly CS7)	<p>The housing mix should be determined on a site by site basis. It is important that the market housing mix is determined by the private sector so that residential schemes can respond to the market demands and site specifics at any one time, taking into account market signals.</p> <p>The size of dwellings relates more to age and wealth than it does to the sizes of households. Households typically build up wealth through the course of a lifetime. Using a lifecycle model household's may start with smaller housing but progress up a housing ladder over the course of a lifetime looking for larger properties when they have children and when they are able to afford to do so. As they age and children move away from home, many households choose to remain in their existing housing rather than downsize. There is therefore typically no direct relationship between house size and household size in the private sector. The social sector is more regulated in that housing is allocated in relation to the housing size required but it is not. It is apparent that housing and planning policies have little influence over who occupies housing, particularly in the private sector. Workspace therefore would support a flexible approach to providing for the mix of market and affordable housing. Workspace considers that the dwelling mix should be considered on a site by site basis.</p> <p>Workspace supports the principle of affordable housing provision in new developments for the purposes of securing local need and ensuring a mixed and sustainable community. However, such provision should be considered on a site by site basis, together with its viability and the regeneration benefits a scheme could provide. Workspace objects to the requirement to provide 50% affordable housing on development sites. Workspace considers that affordable housing should be considered subject to site characteristics, location and overall scheme. It is apparent that housing and planning policies have little influence over who occupies housing, particularly in the private sector. Workspace therefore would support a flexible approach to providing for the mix of market and affordable housing. Workspace considers that the dwelling mix should be considered on a site by site basis.</p> <p>Workspace supports the principle of affordable housing provision in new developments for the purposes of securing local need and ensuring a mixed and sustainable community. However, such provision should be considered on a site by site basis, together with its viability and the regeneration benefits a scheme could provide. Workspace objects to the requirement to provide 50% affordable housing on development sites. Workspace considers that affordable housing should be considered subject to site characteristics, location and overall scheme viability. PPS3 states in paragraph 29 that affordable housing targets should take into account the risks to housing delivery. Indeed a number of core strategies such as Blythe Valley and Wakefield have been found unsound on the basis that they have not assessed the viability of affordable provision.</p> <p>Workspace agrees that the tenure mix of 70% social rented housing and 30% intermediate affordable housing should be considered as guidelines and open to negotiation. Workspace considers that the affordable housing tenure be determined on a site by site basis. Workspace also considers it important that the tenure mix be indicative only and open to negotiation whereby issues such as schemes viability and the economic and social benefits of regeneration should be taken into consideration.</p>	<p>A key objective of the Core Strategy is to provide housing choice in meeting the aspirations of existing and future residents.</p> <p>In line with guidance set out in PPS3 the support of the Strategic Housing Market Assessment helps determine the dwelling mix for new residential schemes.</p> <p>On the basis of the SHMA, an affordable housing viability assessment and local circumstances we have also set an appropriate level of affordable housing and tenure mix.</p>	Revise CS4 and supporting text
-------------	---	-----	--------	---------------------	---	---	---	--------------------------------

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

2 4 3	1			McCarthy and Stone Retirement Lifestyles Ltd	CS4 Quality homes and housing choice (formerly CS7)	My client McCarthy & Stone Retirement Lifestyles is pleased to see such detailed consideration of older persons housing needs. We would add that there is a lack of housing choice in the sheltered accommodation as identified by 13.4.2 where we are told that 89% of the sheltered accommodation in the borough is for rent. Combine this with comment 13.4.1 that the older people in Barnet are more likely to be owner occupiers and more likely to under occupy their properties then it points to an identified housing need in the borough for private sector for sale sheltered accommodation and extra care housing. My client would wish the Core Strategy to acknowledge the role private sector older persons accommodation will have in meeting housing need.	The Core Strategy promotes housing choice and recognises this is an issue for older people. The private sector for older persons therefore has a role to play in delivering appropriate accommodation.	None
3 7 4	7			A2 Dominion Housing	CS4 Quality homes and housing choice (formerly CS7)	Preferred Policy CS 7 does not set out a preferred mix of dwelling sizes and types of housing for all tenures, advocating that each site should be considered on its own merits and the character of the area. This policy should go further and state that not every location will be appropriate for all types of housing. In addition, where more site specific guidance is available to advise on the local requirements then this document should take precedent. Preferred Policy CS 7 also identifies that the Borough will aim to create successful communities by securing an appropriate level of affordable housing for Barnet that will support the Council's objectives of widening home ownership and providing family homes. The level on affordable housing will be based on a Borough wide assessment of viability of affordable and will have regard to the Mayor's strategic housing target that 50% of housing provision should be affordable on sites of 10 or more units. Policy CS 7 also notes that with regard to the London Plan objective of a 70:30 social rented to intermediate ratio, an appropriate affordable mix will be negotiated to deliver wider sustainable development and regeneration objectives.	A key objective of the Core Strategy is to provide housing choice in meeting the aspirations of existing and future residents. In line with guidance set out in PPS3 the support of the Strategic Housing Market Assessment helps determine the dwelling mix for new residential schemes.	Revise CS4 and supporting text
3 7 9	1 7			Asda Stores Ltd	CS4 Quality homes and housing choice (formerly CS7)	We welcome policy that seeks the development of a mixture of dwellings throughout the Borough. Policy should allow flexibility for the Council to review the merits of each respective proposals having regard to site constraints and the viability and deliverability of the scheme.	Please see response at 374/7	Revise CS4 and supporting text
3 7 9	1 8			Asda Stores Ltd	CS4 Quality homes and housing choice (formerly CS7)	It is important that the Council's affordable housing policy reflects local requirements and has regard to the constraints and viability of each respective scheme.	A key objective of the Core Strategy is to provide housing choice in meeting the aspirations of existing and future residents.	Revise CS4 and supporting text
3 7 9	1 9			Asda Stores Ltd	CS4 Quality homes and housing choice (formerly CS7)	<p>In setting a 50% target the London Plan notes that this target includes affordable housing from all sources and not just that secured through planning obligations. It comprises all types and tenure of housing associations, intermediate housing, non-self contained accommodation, gains from conversions and from bringing long-term vacant properties into use as a new housing.</p> <p>The London Plan advises Council's that in estimating the provision of affordable units from private residential or mixed use developments that they should take into account economic viability, highlighting that in all but the highest value sites it is unlikely that the development will be able to fund development of 50% of units as affordable. On this basis we welcome confirmation that policy in Barnet will not be dictated by the London Plan but will be based on Barnet's assessment of local needs. Further to this however, the Council should make clear that when agreeing proportion of affordable housing to be included within housing developments that will do so having regard to the specific merits of the proposals, including design requirements, viability and deliverability.</p>	Please see response at 374/7	Revise CS4 and supporting text

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

404	5	Matthew	Thomas	Bride Hall Holdings Ltd	CS4 Quality homes and housing choice (formerly CS7)	Bride Hall is supportive of the flexible approach taken to the provision of affordable housing.	We welcome this support	None
418	11	Julia	Hines	Age Concern	CS4 Quality homes and housing choice (formerly CS7)	In addition older people believe that new homes should be designed with walk in showers as these are easier for older people with disabilities to use than baths.	We do recognise this as an issue but detailed design considerations are not appropriate for the Core strategy	None
418	15	Julia	Hines	Age Concern	CS4 Quality homes and housing choice (formerly CS7)	We are concerned about the lack of fixed targets for affordable housing. Recent weather conditions have shown the importance of having key workers in, for example, health and social care and public transport, living within the borough to ensure crucial services can be provided. We support mixed and balanced developments, because we do not see the alternative (pockets of deprivation) as being supportive to the needs of older people within the borough. Older people within the borough strongly support the provision of sheltered housing.	On the basis of evidence from the SHMA we have now set an affordable housing target for the next 15 years which is supported by an economic viability assessment A key objective of the Core Strategy is to provide housing choice in meeting the aspirations of existing and future residents. Sheltered housing should form part of a range of choice for older people.	Revise CS4 and supporting text
429	2	Gaby	Kagan	Labour Group	CS4 Quality homes and housing choice (formerly CS7)	At section 5, 'The challenges we face' the Strategy lists high quality housing as one of the reasons people choose to live here, but the fact remains that many people cannot afford to live in Barnet with average house prices in the borough between £300,000 and £400,000. To secure a mortgage on a property valued at £300,000 a household income of about £100,000 would be required, but it is estimated that only 10.5% of residents earn in excess of £75,000 a year, with 11.6% earning less than £15,000. Throughout the Strategy we read about the 'aspirations of home ownership' and there's frequent reference to 'housing choice' but on the council's own data even low cost or shared ownership schemes are out of reach of many people in the borough, and therefore greater emphasis must be placed on building affordable homes for rent as well as to buy. Without a serious commitment to providing more quality affordable homes for rent inevitably only more affluent people will be able to afford to live in Barnet.  Housing gets a mention in section 6 on Vision and Objectives where again the promise is 'to manage housing growth to meet housing aspirations'. Reference is made to regeneration of the estates, Dollis Valley, Grahame Park Stonegrove/Spur Road and West Hendon to replace the existing homes with 'a greater range of accommodation that provides access to affordable and decent homes.' But the original estates had a total of 3688 homes, all of which were affordable social rented and the regeneration schemes will not deliver any net increase in affordable housing. In fact, there may be a net loss of affordable housing. The phase underway at Stonegrove/Spur Road for example has been allowed to proceed with a reduction in the number of affordable homes initially agreed.. The current London Plan stipulates that Barnet needs to build 20, 550 houses in the next 10 years, 50% of which needs to be affordable. The 50% affordable units target is also a Barnet LDP policy and in our Affordable Housing	On the basis of evidence from the SHMA we have now set an affordable housing target for the next 15 years which is supported by an economic viability assessment	Revise CS4 and supporting text

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 2 9	7	Gaby	Kagan	Labour Group	CS4 Quality homes and housing choice (formerly CS7)	Policy CS11 could give more prominence to the work of the Safer Neighbourhood Teams. They are not actually mentioned in the text of the policy. They have made a difference and many have developed a detailed knowledge of their local areas that might add value to planning and development, for example, of town centres.	Agree	Reference to safer neighbourhood teams added to CS12.
4 3 3	3	Georgia	Wrighton	Women's Design Group	CS4 Quality homes and housing choice (formerly CS7)	BWDG welcome that Barnet are seeking to provide housing size and type to meet the diversity of the growing population, however, provision of lifetime homes is a key part of meeting the needs of a diverse population throughout its life and for those who are less mobile or require wheelchair access. Therefore all new homes should be provided to Lifetime Home standards and provide at least 10% wheelchair accessible housing. Lifetime Neighbourhoods should also be a driving principle behind all new developments and changes to existing neighbourhoods. Furthermore, Barnet should produce its own Supplementary Planning Document setting out what is expected of developers for Lifetime Homes, Neighbourhoods and Wheelchair accessible housing.	All new homes are required to be built to lifetime homes standards by the London Plan. This also includes a requirement for 10% of housing to be wheelchair accessible. In line with PPS12 we do not need to repeat this policy. The Mayor intends to produce SPG on the quality and design of housing developments. In providing quality homes and housing choice we support lifetime neighbourhoods and Building for Life Standards.	None
4 3 3	4	Georgia	Wrighton	Women's Design Group	CS4 Quality homes and housing choice (formerly CS7)	The retention of social rented housing in existing neighbourhoods and provision of the many more social rented units needed in the Borough is a key concern for the BWDG. The BDWG would like to see 50% of all new housing provided as affordable housing with 70% social rented and 30% intermediate housing, with a proportion also for co-operatives.	On the basis of evidence from the SHMA we have now set an affordable housing target for the next 15 years which is supported by an economic viability assessment	Revise CS4 and supporting text
4 3 6	8	Robert	Newton		CS4 Quality homes and housing choice (formerly CS7)	<p>Add the following additional bullet points:</p> <p>"Ensuring that developments comply with Policy 3.5, Table 3.3 and Paragraphs 3.26 to 3.33 of the London Plan Consultation Draft Replacement Plan (October 2009) with regard to the quality and design of housing and space standards." "Encouraging and promoting the provision of homes suitable for older people in town centre and other accessible locations with good local service provision so as to provide opportunities for relocation and the release of under occupied family houses."</p> <p>"Ensuring that new housing provision in the Borough is more balanced to satisfy the demand for houses with gardens and to address the shortage of larger houses in particular at the same time as inhibiting opportunities to replace single family housing by conversion and redevelopment for flatted accommodation."</p> <p>'Reason. To ensure adequate construction standards, make provision for older people whilst facilitating the release of under occupied houses and halting the loss of family housing. Amend the wording of Paragraphs 13.1.1 to 13.10.1 where necessary to reflect these changes to Policy CS7.</p> <p>Reason. To ensure adequate construction standards, make provision for older people whilst facilitating the release of under occupied houses and halting the loss of family housing that are in short supply to flatted development that is being adequately provided for under Strand 3 of the Three Strands Approach.</p>	<p>On the basis of evidence from the SHMA we have now set an affordable housing target for the next 15 years which is supported by an economic viability assessment</p> <p>Density has already been addressed at policy CS3 and there is no need to repeat policy. The Core Strategy does seek to promote housing choice in meeting the aspirations of existing and future residents, young and old. The issue of limited housing choice for older persons is recognised as is their desire to remain within their neighbourhoods and enjoy a good quality of life. We will set out policy on older persons accommodation in the Development Management Policies DPD.</p>	Revise CS4 and supporting text

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

440	10			Brent Cross Cricklewood Development Partners	CS4 Quality homes and housing choice (formerly CS7)	Policy CS7 sets out the Council's approach to housing in the borough. With regard to the appropriate level of affordable housing, the policy states that regard will be had to the Mayor's strategic housing target of 50% and the social rented: intermediate split of 70:30, as set out in the adopted London Plan. As noted in explanatory paragraph 13.9.6, the policy should be updated in the future as necessary to reflect the emerging strategic policy direction of the new London Plan.	On the basis of evidence from the SHMA we have now set an affordable housing target for the next 15 years which is supported by an economic viability assessment	Revise CS4 and supporting text
442	7			British Library	CS4 Quality homes and housing choice (formerly CS7)	The BL supports this flexible approach to affordable housing provision and is pleased to note that the CAAP sets an affordable housing policy in line with the London Plan 50% target to negotiate the maximum reasonable amount subject to viability. Paragraph 3.54 of the London Plan states that "the Mayor wishes to encourage, not restrain residential development and boroughs should take a reasonable and flexible approach on a site-by-site basis" The BL supports a site by site approach being taken to affordable housing provision, mix of housing units and housing density, taking into account the constraints and opportunities of each housing site, rather than a blanket requirement being implemented across the whole of the borough.	Please see response at 374/7	Revise CS4 and supporting text
443	7			Metropolitan Police Authority	CS4 Quality homes and housing choice (formerly CS7)	The MPA support the provision of affordable housing and in particular key worker housing in line with the London Plan.	We welcome this support	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 5 5	3 0	Mike	Dawson	Finchley Society	CS4 Quality homes and housing choice (formerly CS7)	<p>The sector with the least choice and greatest need of homes in Barnet is affordable housing (DoT, item, 13.2.5):          "We know that there is a surplus of accommodation in the private rented sector in all sizes while there is a shortfall of affordable housing in all sizes."          DoT (item, 13.2.6) also claims that housing density is driven by targets for Barnet in the London Plan:          "Barnet's Core Strategy has to address the demands for family accommodation at lower densities while meeting the demands for higher densities driven by the planned growth and regional housing targets in the London Plan."          Barnet's own target of 28,000 homes is some 25% above that required by the London Plan of 22,055 homes to be achieved by 2026. It must therefore be possible to provide more lower density accommodation while still fulfilling London Plan requirements.          Policy CS 7, bullet point 4 and the final paragraph of CS 7 should be amended to read:</p> <ul style="list-style-type: none"> <li>• securing a mix of affordable housing for Barnet that will support our objectives of widening home ownership and providing family homes. This mix will be based on a borough wide standard of affordable housing required by the Mayor's strategic housing target of 50% (or as in the amended plan to come) of housing provision should be affordable and that the threshold for negotiating provision should be set at 10 units. With regard to the London Plan objective of a 70:30 social rented to intermediate ratio, we will negotiate an appropriate affordable mix which delivers wider sustainable development and regeneration objectives</li> </ul> <p>final paragraph:          We will monitor the delivery of additional housing against the target (of 20,055 new homes by 2016/17) set within the London Plan and will seek to maintain supply at the rate necessary to meet the target. In seeking to maintain the housing supply we will adjust the type and mix of housings</p>	<p>We have responded to the issue already at 455/3</p> <p>On affordable housing please see response at 374/7</p>	None
4 6 2	3	MWG	Scott	Garden and Plant Centre Developments Ltd	CS4 Quality homes and housing choice (formerly CS7)	<p>Paragraph 13.1.1 'We have to maximise housing choice providing a range of sizes and types of accommodation that can meet aspirations and increase access to affordable and decent new homes.'          'This includes homes for those who need large places to live including families'.          Paragraph 13.2.3 states 'The Mayor's SHMA for London suggests that the biggest requirement for market as well as social rented housing are two bedroom units while the biggest requirement for intermediate housing is four plus beds'.          Paragraph 13.9.1 states 'Home ownership remains beyond the reach of many residents in the borough; the numbers in temporary accommodation remain unacceptably high.'          The above sentiments are expressed in Policy CS7 as:</p> <ul style="list-style-type: none"> <li>• 'Seeking to ensure a mix of housing products in the affordable and market sectors to provide choice for all households'</li> <li>• 'Seeking a range of dwelling sizes and types of housing including family and lifetime homes'</li> <li>• 'Securing an appropriate level and mix of affordable housing for Barnet'</li> </ul>	Please see response at 374/7	Revise CS4 and supporting text

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 6 2	5	MWG	Scott	Garden and Plant Centre Developments Ltd	CS4 Quality homes and housing choice (formerly CS7)	<p>Paragraph 13.7.1 states that Barnet's current housing target is to provide a minimum of 20,055 new homes by 2016/17. The 2008/9 Barnet AMR is unavailable but the Barnet Housing Strategy up to 2026/27, Figure 1 on page 30, indicates that past records of housing completions, and those projected for 2009/10 and 2010/11, all fall beneath the planned housing completion target (which is in any event a minimum not a maximum). In the current economic climate the ambitious housing targets for 2011/12 to 2013/14 are unlikely to be achieved. There is no evidence provided in the Core Strategy of there being sufficient deliverable (i.e. suitable, available and achievable) sites for housing to substantiate the next five years housing target, particularly bearing in mind that such housing provision should not be just one or two bedroom accommodation in flats but also family affordable housing to meet the requirements set down in Policy CS7:</p> <ul style="list-style-type: none"> <li>• 'Ensure a mix of housing products in the affordable and market sectors to provide choice for all households.'</li> <li>• 'Seeking a range of dwelling sizes and types of housing including family and lifetime homes.'</li> <li>• 'Securing an appropriate level and mix of affordable housing for Barnet.'</li> </ul>	We are required to demonstrate sufficient supply for the delivery of our housing target by national policy contained in PPS3. Clarification of the 15 year housing target is provided in supporting text to CS1	Revise supporting text to CS1
4 6 7	2 6	Pauline	McKinnell	Cricklewood Community Forum	CS4 Quality homes and housing choice (formerly CS7)	Don't agree with 1 million extra people of the London Plan. Think you should deliver the housing needs of the borough which I believe is short of affordable housing of all sorts, private and public.	Please see response at 374/7	Revise CS4 and supporting text
4 7 0	1 1			Government Office for London	CS4 Quality homes and housing choice (formerly CS7)	Policy CS7 (Providing Quality Homes) states that affordable housing and the social to intermediate ratio provisions will have "regard to the London Plan" objectives. PPS3, Para 29 requires Local Planning Authorities to set an overall target for the amount of affordable housing to be provided and to set targets for social-rented and intermediate affordable where appropriate. The policy should therefore state a specific target for Barnet.	Agreed. On basis of evidence from the SHMA and the viability study we have set a target for affordable housing and a tenure split	Revise CS 4
4 7 7	2 2	Andrew	Newby	Barnet Green Party	CS4 Quality homes and housing choice (formerly CS7)	This section makes the right noises but is meaningless because it fails to specify what the housing mix might be or what the appropriate level of affordable housing might be. It makes no mention of housing for rent	Please see response at 374/7	Revise CS4 and supporting text
4 7 7	2 4	Andrew	Newby	Barnet Green Party	CS4 Quality homes and housing choice (formerly CS7)	This clause would be fine if it didn't include several get out clauses: "having regard to the financial viability of development, the housing market and the needs of different groups" which would allow the council to duck its obligations.	A viability assessment of affordable housing delivery is required by national Planning Policy Statement 3.	None
4 8 1	2 5	David	Dobbs		CS4 Quality homes and housing choice (formerly CS7)	Agreed in principle, but there needs to be more regard to the needs to 'affected' residents who may be in close proximity to such site allocations. Also, such allocations for Gypsies and Travellers need to be limited or prescribed in some way to prevent creeping enlargement.	Proposals for such sites will involve engagement with local communities.	None
4 8 3	2 4	Maria	Nash	Barnet Women's Design Group	CS4 Quality homes and housing choice (formerly CS7)	Barnet needs to have an Accessible Housing Register to ensure the homes that are specifically built or adapted for disabled people and wheelchairs users remain for other disabled residents in Barnet	All new homes are required to be built to lifetime homes standards by the London Plan. This also includes a requirement for 10% of housing to be wheelchair accessible. In line with PPS12 we do not need to repeat this policy. The Mayor intends to produce SPG on the quality and design of housing developments. In providing quality homes and housing choice we support lifetime neighbourhoods and Building for Life Standards.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

483	25	Maria	Nash	Barnet Women's Design Group	CS4 Quality homes and housing choice (formerly CS7)	Plus there should be more access to mental health and care services which move with Gypsies and Travellers	Identifying the sites to address their long term needs would address these issues.	None
487	21	Michael	Storey		CS4 Quality homes and housing choice (formerly CS7)	MORE FAMILY HOUSES. LESS 1- AND 2-BED FLATS. Build more houses, build less flats. Don't seek to outstrip the London Plan. Keep more flats out of New Barnet - there are already a surplus.	In line with guidance set out in PPS3 the housing mix is supported by the sub regional Strategic Housing Market Assessment.	None
488	29	Glen	Rollings	Greater London Authority	CS4 Quality homes and housing choice (formerly CS7)	The draft replacement London Plan and Housing SPG do not include the 50% target, but continue to seek the maximum reasonable provision of affordable housing. In addition the aspirational tenure split has been revised to 60% social rented to 40% intermediate housing. Also, the figure for housing provision is set out as 22,550 in the draft replacement London Plan. 'Consideration should normally only be given to off-site provision where an alternative site or sites have been identified which would enable affordable housing provision more appropriate to the identified needs to be met and where the project is deliverable prior to the on site market development being completed. 'The dwelling mix should be appropriate to the area and relate to housing need. The housing mix proposed should therefore maximise the potential of the site as set out in policy 3A.3 of the London Plan and relate to the London Plan density as set out in draft London Plan table 3.2.	We have developed our approach to affordable housing on the basis of evidence from the Strategic Housing Market Assessment and the affordable housing viability study together with PPS3 and the adopted and draft versions of the London Plan.	Revise policy CS4 and supporting text
241	3	Ian	Dubber	Workspace Group PLC	CS5 Protecting and enhancing Barnet (formerly CS3)	Workspace supports the promotion of high quality design in new developments that create unique places with a local character. Workspace considers that the design of new residential developments should be considered on a site by site basis. Workspace considers that the Council should seek to achieve high-density residential development to maximise the use of redundant and underused land.	PPS1 recommends that all those involved in the development process should aim for high quality and inclusive design. Density should not drive development; it is an important factor, along with the local context, design, transport and infrastructure. The CS clearly sets out that we seek high quality design that is appropriate to the growth being sought.	None
379	7			Asda Stores Ltd	CS5 Protecting and enhancing Barnet (formerly CS3)	It should be clear that policy will not stifle contemporary design and high density development where this is considered appropriate against other policies set out in the strategy and compliments the surrounding area.	PPS1 recommends that all those involved in the development process should aim for high quality and inclusive design. Density should not drive development; it is an important factor, along with the local context, design, transport and infrastructure. The CS clearly sets out that we seek high quality design that is appropriate to the growth being sought.	None
418	9	Julia	Hines	Age Concern	CS5 Protecting and enhancing Barnet (formerly CS3)	We support the protection of front and back gardens because of the contribution they make to the character, biodiversity and flood defences within the borough.	We welcome this support	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

430	5	Dennis	Pepper	Barnet Borough Group London Wildlife Trust	CS5 Protecting and enhancing Barnet (formerly CS3)	<p>We approve the DPDs concern over the loss of front and rear gardens to off-street parking and backland development and welcome the intention to take 'robust' action to protect them. By protecting the suburb's distinctive character in this way, the council would also be protecting wildlife habitats and corridors, many of which are currently being lost to thoughtless and indiscriminate 'improvements.'</p> <p>We think this objective should be incorporated into Policy CS3.</p>	<p>We do recognise the importance of protecting gardens for biodiversity and sustainability as well as local character however without draconian measures we are unable to prevent residents exercising their rights through permitted development to make minor alterations to their properties front and back gardens.</p>	None
436	4	Robert	Newton		CS5 Protecting and enhancing Barnet (formerly CS3)	<p>Reason: The existing wording of Policy CS3 does not reflect Paragraph 2.3.1 and it should. Rewrite the second paragraph of Policy CS3 to read: "In order to further protect the Borough's suburban houses outside the existing conservation areas, we will require the retention of houses and gardens for single family occupation except in specific areas designated in the site allocation and development management DPDs. Additionally, the draft Barnet Characterisation study will provide the basis for assessments of individual areas for the purposes of providing detailed guidance for house extension and appropriate infill development. In the second line of the third paragraph replace the word "encourage" with the word "require". Replace the fourth paragraph with: Replace the fourth paragraph with: "We will produce: • Design guidelines for the limited number of areas where there is a dominance of flatted development as will be defined in the Site Allocation and Development Management Policy DPDs, whilst otherwise protecting and safeguarding suburban housing and shopping parades and suburban housing on the edge of town centres.</p> <ul style="list-style-type: none"> <li>• Design guidelines on the quality and design of housing and space standards that will require compliance with Policy 3.5, Table 3.3 and Paragraphs 3.26 to 3.33 of the London Plan Consultation Draft Replacement Plan (October 2009).</li> <li>• Policies in the Development Management DPD for safeguarding the front and rear gardens of houses and the stock of larger family houses together with the safeguarding of public and private amenity open space and allotment sites."</li> </ul> <p>Amend the wording of Paragraphs 9.1.1 to 9.3.3 where necessary to reflect these changes to Policy CS3.</p>	<p>The Development Management Policies DPD will provide a more detailed policy framework for protection, conversion and redevelopment of suburban housing. We are producing Residential Design Guidance SPD to provide design guidelines for places with a consistent and coherent architectural character. The Residential Design Guidance SPD will address infill development. Design Guidance Note 5 addresses extensions to houses and has recently been revised. Without draconian powers we are unable to prevent residents exercising their rights through permitted development to make minor alterations to their front gardens.</p> <p>We are supportive of the Mayors approach to the quality and design of housing including the housing density matrix and the new space standards in the draft London Plan. If the standards pass scrutiny and form part of the final London Plan they will replace the standards set out in the SPD on Sustainable Design and Construction.</p>	None
437	3	P E	Pickering		CS5 Protecting and enhancing Barnet (formerly CS3)	<p>I welcome the proposal to identify places of special locally distinctive character. I suggest adding 'in association with local voluntary organisations' between 'identify' and 'places'. It is essential however those areas outside those places should not be 'free- for-all's' for developers, and the policy should include words to make that clear.</p> <p>The words in brackets in the last bullet point but one are unacceptable and should be removed or heavily qualified, for instance by reading in their place '(as may be the case along parts - especially near town centres - of the main thoroughfares . . .)' I look forward to seeing the detailed design guidelines in draft and commenting on them.</p>	<p>The Development Management Policies DPD will provide further detail on policy relating to protecting the boroughs character. Please see response to 437/2 on major thoroughfares</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

439	4	Zenda	Green	Mill Hill Preservation Society	CS5 Protecting and enhancing Barnet (formerly CS3)	Policy CS3 – Protecting and enhancing Barnet's character (P42) makes reference to Barnet's distinctive character, but focuses disproportionately on the built form. It should be more explicit about the value of green spaces and green belt. It is unclear how the findings of the Draft Characterisation Study have influenced policy and there is no map or plan to indicate how the character areas will be defined.	The Characterisation Study has focused on the built environment and not the Green Belt as it is in the suburbs that the challenge of managing change is greatest. The Open Space Needs Assessment has examined the qualitative as well as quantitative aspects of public open space. The Development Management Policies DPD will provide further development of policy for protecting the suburbs. Natural England have identified at least two landscape character areas in Barnet – Barnet Plateau and Finchley Ridge as part of the London Regional Landscape Framework. These types form the basis for our Green Grid areas and the further development of green infrastructure.	Revise supporting text to CS5 on landscape character types and CS7 on the Green Grid
441	7	Warren	Forsyth	Middlesex University	CS5 Protecting and enhancing Barnet (formerly CS3)	The University welcomes the recognition in paragraph 9.1.7 that campus development such as the Middlesex University campus at Hendon is a distinctive primary urban typology. This has underpinned the Masterplanning work for the development and expansion of the Hendon Civic and University Quarter at Hendon that will enable Middlesex University's currently dispersed programmes at Trent Park and Cat Hill to be consolidated in Barnet within the Hendon flagship campus.	We welcome this support	None
442	4			British Library	CS5 Protecting and enhancing Barnet (formerly CS3)	The BL notes and supports Policy CS3 which seeks to ensure development in Barnet respects local context and distinctive local character. The BL recognise that detailed design guidelines will be produced in the future for a number of areas in the borough. The BL wishes to be consulted in the production of these documents. The BL note and support that such guidance should not be overly prescriptive.	We welcome this support	None
443	4			Metropolitan Police Authority	CS5 Protecting and enhancing Barnet (formerly CS3)	The MPA recognise the importance of good design in ensuring new developments are safe and secure, therefore helping reduce crime. The MPA support the development of safe and attractive building layouts, however it is recommended that reference to the use of 'Secured by Design' principles are included within this policy, concurrent with government guidance within PPS1 which states that Council's should prepare development plans which promote inclusive, healthy, safe and crime free communities. This further provides excellent guidance to developers and other built environment professionals. Furthermore, the MPA note that Policy CS 11 supports making Barnet a safer place and support this policy. The MPA recommend that the following alteration is made to Policy CS3 - We will ensure that development in Barnet respects local context and distinctive local character and creates: - safe and attractive building layouts in line with Secured by Design Principles.	The Development Management Policies DPD will provide further detail on policy for design.	Revise supporting text of CS 5 to refer to Secured by Design Principles

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

446	10	Graham	Saunders	English Heritage	CS5 Protecting and enhancing Barnet (formerly CS3)	<p>Welcome the development of a borough wide Characterisation Study. However we are concerned that the Study is not sufficiently comprehensive, in that it excludes the major growth areas, green belt and conservation areas. This Study could have played a key role in pulling existing evidence together and expand upon it to provide a truly borough wide understanding of the character of the Borough. At present it is not clear whether this coordination of evidence will be undertaken as the current approach could be criticised for being incomplete. We have provided informal comments at the early stages of this Study but have not been further engaged (initial comments on the Study were set out in our email to you dated 28th May 2009). We would welcome the opportunity to provide further advice and encourage you to broaden the coverage of the Study to include those areas currently excluded.</p>	<p>We consider that the study is sufficiently comprehensive and provides a good understanding of Barnet's character therefore meeting our objective of safeguarding the suburban nature of the borough. We have set a clear spatial strategy through the Three Strands Approach which enables the Core Strategy to integrate the needs of places with the priority issues that need to be addressed. Our evidence base needs to be proportionate and our focus has been on those areas that are not protected as Green Belt/MOL, Conservation Areas or identified as growth areas. There is not a one size fits all blanket approach to work on characterisation.</p>	None
446	11	Graham	Saunders	English Heritage	CS5 Protecting and enhancing Barnet (formerly CS3)	<p>It is important to note 'gardens' can also provide an important contribution towards the character, appearance and setting of the heritage assets such as listed buildings and conservation areas. In the development of a criteria-based policy for assessing proposals involving gardens (paragraph 9.2.5) we would seek to ensure the heritage value of gardens are considered as part of the criteria.</p>	<p>The Development Management Policies DPD will provide further detail on policy for heritage</p>	None
446	12	Graham	Saunders	English Heritage	CS5 Protecting and enhancing Barnet (formerly CS3)	<p>Support generally Policy CS3 as a policy framework in which to manage the general character of the Borough. In particular welcome the commitment to identify areas outside conservation areas, which are of special locally distinctive character. Using the evidence collected from the Characterisation Study to inform this process is also welcomed. We would also suggest that the Greater London Archaeology Advisor Service (GLAAS) could provide useful information to help identify these areas of special character areas and would encourage their involvement.</p> <p>However a fundamental concern of Policy CS3 is that lack of clarity and purpose it has for protecting and enhancing the historic environment as advised by PPG15 and PPG16. It is not clear whether it was the intention of this Policy to cover this important issue, as there appears to be no other policies in the Core Strategy which relates to heritage matters. At present the UDP contains a robust range of heritage policies which do help provide clarity on how the historic environment is protected</p> <p>As currently proposed for the Core Strategy there is no policy framework for the historic environment, which is a major concern that raises the issue of soundness. In particular we would urge you to either adapt CS3 or introduce a</p>	<p>Further references to the importance of the historic environment have been added to the Core Strategy, CS5 and supporting text. The Development Management Policies DPD will provide further detail on policies for heritage alongside PPS5. Policy CS5 has been revised to set out a framework for the management of Barnet's historic assets. We are producing a Tall Buildings Study which will help us to assess future proposals for tall buildings.</p>	Revise CS5 and supporting text

**Representations for Core Strategy Direction of Travel and Council's Response and Recommendations**

--	--	--	--	--	--	--	--	--

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 5 5	9	Mike	Dawson	Finchley Society	CS5 Protecting and enhancing Barnet (formerly CS3)	We propose that suburban houses and gardens should be protected from new-flatted developments and conversions and protection given to the houses situated along major transport routes. New flats and conversion should be restricted to above business premises within the existing town centre envelopes and in development and regeneration areas where flats already exist. New apartments/conversions in Town Centres should have a condition that prohibits the issue of CPZ permits, to ensure sustainable homes, limit CO2 pollution and additional traffic congestion.	The Development Management policies DPD will provide a more detailed policy framework for protection, conversion and redevelopment of suburban housing. We are producing Residential Design Guidance SPD to provide design guidelines for places with a consistent and coherent architectural character. The Residential Design Guidance SPD will address infill development. The approach to the issuing of permits for new development reflects the strategy that was agreed by Cabinet in 2004.	None
4 5 5	1 8	Mike	Dawson	Finchley Society	CS5 Protecting and enhancing Barnet (formerly CS3)	This section is given special emphasis because we fear what is planned for our Town Centres and their associated main roads. While we wait for Town Centre strategies to be made, uncoordinated planning applications have been made for North Finchley. Four aspects in particular concern us regarding Town Centre and their associated main roads: i. Applications for five and six storey flatted developments, if approved, would 'canyonise' the area. Left unchecked this style of building would significantly change the character of our Town Centre. We consider the maximum number of storeys permitted should be four, unless special circumstances allow more. ii. Application for joint retail/flatted development outside of the town centre zones should be refused. If allowed, this would weaken the viability of the retail centre. iii. Applications for flatted development within a Town Centre or CPZ, which do not provide car parking space as required by Barnet's UDP/LDF, should be prohibited from being issued with CPZ Permits iv. In some roads in Barnet flatted development has been allowed to infill to an excessive level. Melvin Cohen made a strong point about infill at the recent Civic Forum when he presented the Core Strategy, DoT. He commented on the appalling quantity of flats in Hendon Lane, a suburban road close to Finchley Church End town centre, saying this must not be allowed to happen in other parts of the borough. How then can such infill, on historic routes with buildings of character, become proposed policy in DoT? All development on these routes must be in character with the area and limited in height to match surrounding properties. Canyonisation must not be allowed.	The Development Management Policies DPD will provide further policy on town centres. There is no support in the Core Strategy for retail outside town centres. We refer to our earlier response at 455/9	None
4 5 5	2 4	Mike	Dawson	Finchley Society	CS5 Protecting and enhancing Barnet (formerly CS3)	The Mayor of London has highlighted that in his review of the London Plan he will give greater protection to back gardens because of the wide-ranging contributions that they make to the city. He proposes to set a general presumption against their loss. In order to provide better protection for green spaces at the front and back of houses the Development Management Policies DPD should set policy for gardens in-line with the proposals highlighted by the Mayor of London.	The Development Management Policies DPD will provide further policy on back gardens development. It will be informed by the draft revised London Plan and accompanying SPG	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 5 5	2 5	Mike	Dawson	Finchley Society	CS5 Protecting and enhancing Barnet (formerly CS3)	<p>In general, commercial development in the suburbs is not required. By definition, they are suburbs with family houses. Barnet Council states family houses are a major reason why families choose to live in Barnet.</p> <p>Better protection should be given to maintaining the character of the suburbs. If family homes in the suburbs continue to be converted/redeveloped as flats, the current shortage of family homes will worsen. In instances where the residential typology remains dominant but the character has been undermined by inappropriate flatted development, further flatted development/conversion should be refused. Flatted development in the suburbs is out of character. To attempt to justify flatted development in suburbs by stating that flats are, "...a housing type that is in limited supply in the Borough..."</p> <p>"...a housing type that is in limited supply in the Borough..."</p> <p>Is a misrepresentation of new development in the borough over recent years because the majority of new homes in Barnet are flats.</p> <p>Conservation area status does not necessarily reduce a homeowner's ability to make their homes flexible to changing lifestyle requirements or significantly increase the cost of ownership. Even in Hampstead Garden Suburb, which has enhanced protection, homes are extended, adapted and redeveloped.</p> <p>Policy CS 3: Include in this Policy that:</p> <p>* Flatted development/conversions should not be allowed in the suburbs to maintain the falling stock of family homes.</p>	<p>In order for our town centres to function successfully as sustainable places we need to attract commercial investment.</p> <p>The sub regional Strategic Housing Market Assessment provides the basis for the size of units required and determine the need for family units.</p> <p>The sub regional Strategic Housing Market Assessment provides the basis for the size of units required and determine the need for family units.</p> <p>We refer to our previous answer at 455/9 Major thoroughfares are no longer identified as having potential for infill housing development</p>	None
4 6 4	7	David	Howard	Federation of Residents Associations in Barnet (FORAB)	CS5 Protecting and enhancing Barnet (formerly CS3)	<p>We want to preserve our suburban houses and gardens from new flatted developments and conversions into smaller flats. In particular we feel that the houses along major transport routes should be preserved as they set the character for an area. Local infill and/or intensification may be acceptable but it should be the exception not the norm</p>	<p>The Development Management policies DPD will provide a more detailed policy framework for protection, conversion and redevelopment of suburban housing. We are producing Residential Design Guidance SPD to provide design guidelines for places with a consistent and coherent architectural character. The Residential Design Guidance SPD will address infill development. Major thoroughfares are no longer identified as having potential for infill housing development</p>	None
4 6 4	2 1	David	Howard	Federation of Residents Associations in Barnet (FORAB)	CS5 Protecting and enhancing Barnet (formerly CS3)	<p>Please save us from further high rise development, improve our failed housing estates and otherwise direct new development to designated regeneration and development areas.</p>	<p>This is a borough wide strategic document which is in accordance with CABE on Planning for Places - Delivering Good Design through Core Strategies. We are supportive of the Mayors approach to the quality and design of housing including the housing density matrix and the new space standards in the draft London Plan. If the standards pass scrutiny and form part of the final London Plan they will replace the standards set out in the SPD on Sustainable Design and Construction.</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

466	8	A	Reid	Mount Anvil Plc	CS5 Protecting and enhancing Barnet (formerly CS3)	An acknowledgement that tall buildings will be appropriate in some locations.	We are producing a Tall Buildings Study which will help us to assess future proposals for tall buildings	None
467	9	Pauline	McKinnell	Cricklewood Community Forum	CS5 Protecting and enhancing Barnet (formerly CS3)	All areas should be protected from inappropriate development.	Through the Three Strands Approach the Core Strategy integrates the needs of places with the priority that need to be addressed in Barnet. Therefore there should be appropriate development.	None
467	11	Pauline	McKinnell	Cricklewood Community Forum	CS5 Protecting and enhancing Barnet (formerly CS3)	But please don't allow more high rise blocks of flats just because there are already a few built.	We will apply the density matrix taking into account context as well as access. We are producing a Tall Buildings Study which will help us to assess future proposals for tall buildings	None
471	16	David	Howard	New Barnet Community Association	CS5 Protecting and enhancing Barnet (formerly CS3)	4.8.1/2/3 describes the current property types and mix and paras 7.1.1/2/3 describes why the suburbs are successful. This is what has made the borough successful and a desirable place to live in. Why the obsession of excessive growth which will lead to a more transient population and wreck the success story?	The approach set out in the Core Strategy aims to ensure that the borough remains a successful suburb. The Core Strategy is required to address the challenges that we face as a successful London suburb. There are opportunities for targeted growth and it is imperative that we manage this.	None
477	7	Andrew	Newby	Barnet Green Party	CS5 Protecting and enhancing Barnet (formerly CS3)	the aims are fine except that the third one should specify that all new buildings should producing low emissions and where possible be carbon neutral. The residential part of the development should only go ahead if a condition is set that all projects within the overall scheme are carbon neutral. New homes and other buildings in the area will exist for many decades and all new developments of this kind will need to be nearly carbon neutral if the government is to meet its target of reducing CO2 emissions by 80 percent by 2050. The enlargement of Brent Cross shopping centre should not go ahead at all because of its impact on congestion and pollution and its damage to nearby community shopping centres.	We consider that for a new building to be sustainable it should meet the requirements of our SPD on Sustainable Design and Construction.	None
478	5	Steven	Deller		CS5 Protecting and enhancing Barnet (formerly CS3)	Not the case in Cricklewood where you intend to overwhelm the existing population and break up the public spaces into postage stamp size areas. This only applies to areas to the East of the Hendon Way obviously In Cricklewood you are imposing inappropriate flatted development	The Core Strategy is a borough wide document. Through the Three Strands Approach the Core Strategy integrates the needs of places with the priority that need to be addressed in Barnet. Therefore there should be appropriate development.	None
480	8	Dorothy	Badrick	UKOSF	CS5 Protecting and enhancing Barnet (formerly CS3)	fine words but in reality the development in and around cricklewood has been poor in all aspects. how about cricklewood which contains huge amounts of local history. no to redevelopment yes to cautious and careful restoration. so why does cricklewood get flats the size of rabbit hutches, where's our family housing? please in cricklewood. stop flatted development on the pennine drive estate which should be family housing and throw our bxd plan	The Brent Cross – Cricklewood planning application was approved subject to S106 by the council in November 2009. These issues were considered as part of this application	None
481	8	David	Dobbs		CS5 Protecting and enhancing Barnet (formerly CS3)	Agreed in principle, but the wording is too 'flexible' and ambiguous to be meaningful or to create accountability. The entire borough should be protected from inappropriate development. I don't believe that this is an appropriate proposal	Please see response at 478/5.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

483	8	Maria	Nash	Barnet Women's Design Group	CS5 Protecting and enhancing Barnet (formerly CS3)	This policy needs to be written in stone so that no loop hole is there for the council to try and balance their bad management of council's funds is offset by selling more council land or greedy developers to change the character of Barnet by over building inferior types of buildings which no one checks until it is too late. Local people as well as environmentalist should be consulted backed up by historical data. How will this be monitored? What will be put in place to ensure that these family homes will be for families and not for renting rooms out? Only producing design guidelines without penalties means nothing to the developer because they will do what ever they want as the planning dept and the building regs dept do not speak to each other nor are they properly monitored. The area planning meetings also have to allow residents to have a say not only to sit and listen. Then once there is an objection or a petition it needs to be included in the decision process.	Each policy in the Core Strategy will be monitored based on specific indicators and reported in the Annual Monitoring Report. This will provide clear evidence of policy delivery and a basis for review of the Core Strategy	Addition of monitoring indicators in Appendix B.
485	8	Robert	Shutler	Woodside Park Garden Suburb Residents Association	CS5 Protecting and enhancing Barnet (formerly CS3)	But character is subjective and you need to define what you mean by this. And presumably you will stifle all contemporary design and creativity - too much control	This is a borough wide strategic document which is in accord with CABA advice on Planning for Places - Delivering Good Design Through Core Strategies. We encourage high quality design to create high quality places.	None
487	5	Michael	Storey		CS5 Protecting and enhancing Barnet (formerly CS3)	I don't believe you. You have encouraged bland, characterless and low-quality developments almost without exception. You granted planning permission to a Tesco Express on Victoria Road, EN4 which does not respect local context or the local Victorian and Edwardian character of New Barnet. I think that the chair of CABA, Sir John Sorrell, summed up the problem when he said: "Our concern is not only the quality of this kind of development – which is generally very poor – but the way in which architecture and places are created in the image of the retailer". He specifically mentioned New Barnet, stating "both Asda and Tesco are pushing weak schemes here against strong local opposition", and that "the Asda scheme fails on every level: its car focussed and architecturally confused with poor housing tacked on". You can't see beyond giving the keys to the village to the supermarkets. Again, they're fine words, but unless I live on Wood Street or Totteridge green, I doubt I'll benefit from them. You are hell-bent on getting at least one more giant supermarket in New Barnet, if not more, and something tells me that when you grant planning permission to one or both schemes, they're unlikely to be a two-storey red-brick Victorian-style building. You would see all of this destroyed - <a href="http://www.newbarnet.org.uk/issues/demolished.php">http://www.newbarnet.org.uk/issues/demolished.php</a> What does this actually mean? If it means shoving flats in every corner of every street, no.	Tesco Express was approved at appeal by a Planning Inspector and not the Council.  In order to ensure that brownfield site opportunities in New Barnet are managed in the right way a Town Centre Framework is being developed to provide a strategy for development in consultation with the community. This is a borough wide strategic document which is in accord with CABA advice on Planning for Places - Delivering Good Design Through Core Strategies.	None
488	19	Glen	Rollings	Greater London Authority	CS5 Protecting and enhancing Barnet (formerly CS3)	The distinctiveness studies and identification of character/typology areas is supported. However there is still some ambiguity as to what exactly sets Barnet apart from its surrounding boroughs, leading people to know that they are within Barnet. The findings from the further design studies to be undertaken should be used within future iterations of this policy.	We consider that the Core Strategy does demonstrate the distinctiveness of Barnet	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

P e t i t i o n				Save our suburbs	CS5 Protecting and enhancing Barnet (formerly CS3)	Save our suburban houses and gardens from new flatted developments and conversion and protect the houses situated along major transport routes.	The draft revised London Plan is clear on the use of the density matrix and states that it is not appropriate to apply the table mechanically. There will be opportunities for higher density development within the upper range of the matrix in Barnet. The Development Management policies DPD will provide a more detailed policy framework for protection, conversion and redevelopment of suburban housing. We are producing Residential Design Guidance SPD to provide design guidelines for places with a consistent and coherent architectural character. The Residential Design Guidance SPD will address infill development.	None
2 4 1	4	Ian	Dubber	Workspace Group PLC	CS6 Promoting Barnet's town centres (formerly CS4)	Workspace supports the promotion of Brent Cross / Cricklewood as a new metropolitan town centre and an outer London Development Centre. It is considered that this area could act as a catalyst for economic growth throughout the borough. Workspace supports the efficient use of land and buildings in town centres and the encouragement of a mix of compatible uses including managed affordable and flexible workspace. Workspace considers that substantial mixed-use development should be promoted in all town centres. These developments should promote workspace for small and medium sized enterprises as these businesses provide the backbone of the Outer London and Barnet economy and is forecast by the GLA Economics Evidence Base to grow in importance over the plan period.	We welcome this support. In ensuring the efficient use of space in town centres we encourage a mix of compatible uses.	None
2 4 2	1 2	Peter	Storey	Friern Village Residents Association	CS6 Promoting Barnet's town centres (formerly CS4)	Each centre should maintain/develop its own character to prevent bland repetitive development.	In order for town centres to survive as vibrant places they will have to redefine their roles in response to their strengths. This should make them more distinctive.	None
2 4 4	3	Peter	Hewitt		CS6 Promoting Barnet's town centres (formerly CS4)	As expressed above, if East Barnet is deemed to be a 'local centre' so also should its close neighbour up the East Barnet Road.	New Barnet has been identified as a district centre in the London Plan and its place within Barnet's network of town centres is clear.	None
2 4 4	4	Peter	Hewitt		CS6 Promoting Barnet's town centres (formerly CS4)	I disagree strongly with the implication that New Barnet [together with the Village] has inadequate retail provision. Sainsbury's being the dominant retail outlet, is quite capable of satisfying most of the essential day-to-day grocery and general domestic needs of the local community and further afield, and is amply augmented by Tesco Express, Budgen and a variety of other smaller outlets further along East Barnet Road. This is, I would add not to say that there is no potential for additional retail/commercial establishments in either New or East Barnet. Clearly there is. I would emphasise, however, that as far as supermarkets are concerned it would be irresponsible folly and result in horrendous traffic flow problems if such were permitted in close proximity to Sainsbury's - as has been intimated by both TESCO and ASDA.	There is no dispute that there are brownfield site opportunities within and on the edge of New Barnet town centre. The Town Centre Framework provides the basis for managing change and it is important that development that comes forward includes town centre uses (as defined in PPS 4) and is of an appropriate scale.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

3 7 4	4			A2 Dominion Housing	CS6 Promoting Barnet's town centres (formerly CS4)	Preferred Policy CS 4 seeks to promote Barnet's town centres. In addition, the Council has recognised, in the Brent Cross Cricklewood Regeneration Area Framework SPG (2005) that there is also benefit in providing smaller retail, restaurant and other uses within large-scale residential and mixed use developments, which seek to serve the development and bring activity into the area and to key locations. The Brent Cross Cricklewood Regeneration Area Framework SPG (2005) has identified the former Parcel force Site on Edgware Road as appropriate for small-scale ground floor retail uses. These uses can help to serve local needs and help to add vibrancy to these areas. Preferred Policy CS 4 should be amended to make specific provision for small scale retail facilities as part of mixed use development which will aid the vitality of schemes.	We refer to our previous response at 374/2 which highlights the policy framework for Brent Cross - Cricklewood therefore no specific amendment is required of policy CS6.	None
3 7 9	3			Asda Stores Ltd	CS6 Promoting Barnet's town centres (formerly CS4)	Building on aims to create vibrant town centres, enhance employment opportunities and reduce the need to travel the Council should set out as a key ambition the need to provide retail facilities to meet the needs of the community and the importance of existing centres in meeting the needs of their respective catchment.	PPS4 states that planning authorities should be "planning for a strong retail mix so that the range and quality of the comparison and convenience retail offer meets the requirements of the local catchment area," (EC4.1b). In line with guidance in PPS12 the Core Strategy does not need to repeat this.	None
3 7 9	8			Asda Stores Ltd	CS6 Promoting Barnet's town centres (formerly CS4)	The report 'Creating Vibrant Suburban Town Centres in Barnet' reviewed the Borough as whole. Consequently, whilst the review concluded that 95% of residents do their main food shopping in Barnet's town centre, this is a generic statement that does not reflect accurately retailing patterns in New Barnet. Asda have carried out detailed household survey work that suggests that within New Barnet 67% of convenience trade is currently lost to rival destinations whilst 99% of comparison expenditure is lost. It is evident when contrasted with the Council's wider study that there is a polarisation of trade to larger centres both in and beyond the Borough. In this context it is important that the Council seek to support centres such as New Barnet to ensure they continue to serve their local catchment.	The survey on Creating Vibrant Suburban Town Centres refers to 'main shopping' not 'main food shopping'. The conclusions of the Town Centre Needs Floorspace Assessment and Update are clearly set out with regards to comparison and convenience need.	None
3 7 9	9			Asda Stores Ltd	CS6 Promoting Barnet's town centres (formerly CS4)	We strongly disagree that there is little quantitative need for further significant convenience retailing in the Borough. This conflicts with paragraph 10.6.2 in which the Council acknowledge retail capacity, identifying a need for convenience retailing in New Barnet. Equally it is at odds with NLP's review of ASDA's planning application, commission by the Council early this year, where they concluded that there was a need for 2,385m <sup>2</sup> of convenience retail sales floorspace by 2013 on the Gas Works site. The analysis focuses solely on quantitative need. It is made clear in PPS6 and Draft PPS4 that qualitative factors should be considered and the need to promote choice and competition are highlighted in draft PPS4 as key considerations. Any assessment of need should consider qualitative deficiencies in existing centres.	The Town Centre Needs Floorspace Assessment and Update concurs with PPS4 and sets out a qualitative and quantitative assessment of Town Centres. It has highlighted distinct variations between centres in terms of their scale, retail offer and overall role. This is made clear in the identification of priority town centres. Further work on managing brownfield site opportunities in New Barnet has been developed through the Town Centre Framework	None
3 7 9	9			Asda Stores Ltd	CS6 Promoting Barnet's town centres (formerly CS4)	The text needs to acknowledge that need does exist in the Borough, that some centres are in need to enhanced facilities to enable them to serve their catchment and in this context applications should be assessed on their respective merits.	The Core Strategy is evidence based and is guided by the Town Centre Needs Assessment and Update	None
3 7 9	1 0			Asda Stores Ltd	CS6 Promoting Barnet's town centres (formerly CS4)	As highlighted above there is a danger that trade within Barnet is polarised to higher order centres at the expense of lower order centres in the Borough. It is inappropriate to plan simply for those centres performing strongly. PPS6 and draft PPS4 seek to promote choice and competition and safeguard the vitality and viability of existing centres. Accordingly, it should be made clear that comparison retailing will be supported in all centres, especially where it addresses local deficiencies.	There are 14 district centres, 5 local and one major centre in Barnet. They are all promoted in the policy. Our position on comparison shopping is based on evidence of need as identified in the Town Centre Needs Assessment and Update	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

3 7 9	1 1			Asda Stores Ltd	CS6 Promoting Barnet's town centres (formerly CS4)	We support the definition of New Barnet as a District Centre in the context of the London Plan. Having regard to District Centres in the Borough policy should make clear that development will be supported in these centres to ensure they serve their respective catchments and to help claw back trade lost to larger centres.	All centres are promoted in the policy and a clear hierarchy is set out in the text. CS6 clearly states that we will realise development opportunities in town centres to promote competitive environments and provide consumer choice.	None
3 7 9	1 2			Asda Stores Ltd	CS6 Promoting Barnet's town centres (formerly CS4)	We support acknowledgment that there is need for convenience retail in New Barnet and that this can be accommodated on the Gas works site as part of a mixed use development. Asda are currently considering amended proposals for the site having withdrawn their planning application earlier this year. Remediation and infrastructure costs present key challenges to bringing forward development on the site which will deliver significant regeneration benefits. Proposals for the site need to raise significant value if they are to be viable. Failure to plan for a viable solution for the site will ensure it remains underutilised and blight on in the area. Policy should support ASDA's aspirations for the gasworks in order to help facilitate regeneration of the site. We recommend that the core strategy actively promote this site as the preferable location for convenience retail development in the centre and make clear that central sites such as this can and should bring forward very high density development in terms of the frameworks generally a rigid timetable needs to be provided. Having regard to New Barnet the framework is needed to guide development in the centre. Given the extensive work Asda have now put into bringing this site forward we would welcome early engagement on plans for the site and how the Gas Work site might contribute to these.	In order to ensure that brownfield site opportunities within and on the edge of New Barnet town centre are managed in the right way a Town Centre Framework has been developed in order to provide a strategy for development in consultation with the community. The emerging Town Centre Framework has informed the policy direction on New Barnet The delivery of the Core Strategy is not dependent on the Gas Works site therefore it is not appropriate to reference it directly. The gas works site will form part of our Site Allocations DPD therefore it is not appropriate for the CS to promote it. The proposed allocation will reflect the adopted Town Centre Framework for New Barnet.	None
3 7 9	1 3			Asda Stores Ltd	CS6 Promoting Barnet's town centres (formerly CS4)	As a highly accessible centre in need of revitalisation we strongly support aspirations to realise development opportunities in New Barnet. It is important that development and investment in the centre are encouraged thus the town centre frameworks should seek to embrace development proposals that will revitalise and regenerate New Barnet. Notwithstanding this, it is important that policy seeks to promote development that compliments existing centres. Development should seek to support and underpin existing high streets. Development that has an unacceptable impact on the character of existing centres, visually and economically, should be resisted. It is important that centres within Barnet continue to provide a mixture of national retailers and strong independent provision.	We refer to our previous response at 379/12 The Core Strategy does provide a strong and realistic message on the role and function of town centres	None
4 0 4	4	Matth ew	Thomas	Bride Hall Holdings Ltd	CS6 Promoting Barnet's town centres (formerly CS4)	Bride Hall supports the identification of Edgware as a centre with growth potential and looks forward to working with the London Borough of Barnet and its partners on the Town Centre Framework.	We welcome this support. Consultation on the draft Town Centre Framework is expected by Autumn 2010.	None
4 1 8	6	Julia	Hines	Age Concern	CS6 Promoting Barnet's town centres (formerly CS4)	We see access to local shops selling fresh food as an integral part of developing healthier, integrated communities.	We recognise the importance of such shops to healthy living and reducing the need to travel and therefore seek to protect and enhance local neighbourhood centres and parades of shops.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 2 0	1	Rose	Freeman	The Theatres Trust	CS6 Promoting Barnet's town centres (formerly CS4)	<p>This policy does not recognize the Borough's existing cultural facilities for their protection and enhancement nor does it highlight any deficiency that may require future development. This may have been brought to light in the individual Town Centre Frameworks as mentioned in the second sentence of the policy but unless their 'development opportunities' are reflected in the Core Strategy this policy will not provide robust guidelines for future development proposals. PPS6 (2005 ¶2.22) states that 'Local planning authorities should encourage diversification of uses in the town centre as a whole, and ensure that tourism, leisure and cultural activities, which appeal to a wide range of age and social groups, are dispersed throughout the centre.'</p> <p>Regarding the evening economy PPS6 also states (2005 ¶2.23) 'ensuring that provision is made where appropriate for a range of leisure, cultural and tourism activities such as cinemas, theatres, restaurants, public houses, bars, nightclubs and cafes.'</p> <p>A key Government objective for economic development is to promote the vitality and viability of town centres which includes retail, leisure, offices, arts, tourism and cultural activities.</p>	<p>Theatres are considered a town centre use by PPS4 which has replaced PPS6. As noted policy EC4.2 in PPS4 encourages local planning authorities to "encourage a diverse range of complementary evening and night-time uses which appeal to a wide range of age and social groups, making provision, where appropriate, for leisure, cultural and tourism activities such as cinemas, theatres, restaurants, public houses, bars, nightclubs and cafes". Part b of that policy states that we should take account of their potential impact and cumulative impact. Core Strategy reflects that in CS6.</p>	<p>Add section 4.12 on Barnet and the arts, culture and creative industry.</p>
4 2 0	2	Rose	Freeman	The Theatres Trust	CS6 Promoting Barnet's town centres (formerly CS4)	<p>Paragraph 10.9.1 states that 'there is scope for centres to improve their evening economy' but we cannot find any guidance on this matter in any policies in the document.</p> <p>There is also no Glossary to provide a description of the term 'community facilities'. It may be that the protection and enhancement of your theatres and performance spaces are incorporated in this term but this isn't clear. May we suggest that within the accompanying text of matters regarding community facilities that a definition is added along the lines of community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community. In this way, arts activities and theatre will be incorporated in any policy that mentions the enhancement and development of community facilities.</p>	<p>We do recognise the contribution of arts and culture to the distinctiveness of Barnet and the value of such facilities as community assets. We consider that there is a good description of the range of important community facilities within the Core Strategy</p>	<p>Add section 15.5 on Arts and Culture in supporting text to CS10</p>
4 2 7	2			Tesco Stores Ltd	CS6 Promoting Barnet's town centres (formerly CS4)	<p>Retail need and capacity – convenience goods</p> <p>Paragraph 10.3.1 states that "limited increases in convenience goods capacity are forecast (up to 5,028 m2 by 2021) and this can be addressed by stores in the development pipeline. On the basis of the Assessment analysis there is little quantitative need to plan further significant convenience goods provision in the lifetime of the Core Strategy". We appreciate that this is a necessarily broad assessment for the borough as a whole. It should be recognised however that more sensitive locally based assessments may well demonstrate a local quantitative need.</p> <p>Moreover, the global borough-wide figures should not in any way act a restraint to proposals within centres that accord with the town centre first approach enshrined in both national policy and the London Plan. PPS4 (Policy EC4) places a clear requirement on local planning authorities to promote competitive town centres and provide consumer choice.</p> <p>To ensure the policy fully accords with national planning policy and the London Plan</p>	<p>We consider that CS6 promotes competitive town centre environment and provides consumer choice. It does not restrain proposals for local convenience shopping where there is evidence of need.</p>	<p>Revise CS 4</p>
4 2 7	3			Tesco Stores Ltd	CS6 Promoting Barnet's town centres (formerly CS4)	<p>Clarification should be provided in respect to the development opportunities identified at paragraph 10.6.5 in respect to District Centre sites. Such opportunities should "enhance the vitality and viability" of the respective centre rather than "attractiveness".</p> <p>To ensure the policy fully accords with national planning policy and the London Plan.</p>	<p>Agree to replace 'attractiveness' with 'vitality and viability'</p>	<p>Revise CS 6</p>

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 2 7	4			Tesco Stores Ltd	CS6 Promoting Barnet's town centres (formerly CS4)	The policy states the Council will realise development opportunities in the Centres of Edgware, North Finchley, Finchley Church End, Chipping Barnet, New Barnet and Whetstone. Development opportunities are identified in District Centres (Paragraph 10.6.5) and these should therefore be referred to in the policy as well as these centres play an important role in the retail network and these opportunities accord with the town centre first approach. Such proposals accord with national and regional planning policy, as does the Alternative Option of allowing substantial mixed-use development in all town centres that has not been chosen. To accord with PPS4 it would be helpful to distinguish between Town Centres, District Centres and Local Centres – at present the policy refers to just 'town centres' but includes both Town and District centres. To ensure the policy fully accords with national planning policy and the London Plan.	All centres are promoted in the policy and a clear hierarchy is set out in the text. Reference to known development opportunities in other town centres has been added.	Revise CS 6 and para 11.7.5
4 2 9	3	Gaby	Kagan	Labour Group	CS6 Promoting Barnet's town centres (formerly CS4)	Our town centres are important for the communities in and around them, providing a distinct sense of identity and belonging. Policy CS4 does acknowledge that Brent Cross may be an important regional shopping centre and will be even more so when the Cricklewood/Brent Cross regeneration is complete. However we have to look after all our town centres and, in the interests of sustainability, we must try to make sure residents can access the shopping and services they need in their local town centre and do not have to travel to Brent Cross or further afield. A failure to sustain our local Town Centres results in more car trips, more congestion, more pollution and has a detrimental impact on our health and the environment. Our Town Centres are not museums and therefore we should not be too prescriptive in our planning policies for them, while at the same time ensuring a sensibly strategic approach to ongoing development of our town centres.	Policy CS 6 promotes the vitality and viability of all town centres in Barnet. The Core Strategy does provide a strong and realistic message on the role and function of town centres. We agree that there is a need for flexibility in letting our town centres identify an appropriate new role other than just retail.	Revise CS6 and supporting text
4 3 1	1			Starfield Properties / St James Investments	CS6 Promoting Barnet's town centres (formerly CS4)	Paragraph 10.6.2 advises that "...new Barnet offers an opportunity for additional convenience goods floorspace with a mixed use development on the former gas works site. Whetstone offers opportunities for other town centre uses and mixed use residential development..." We object to the inference that "other town centre uses" excludes convenience goods floorspace which could be provided in Whetstone. We consider the paragraph to be amended to say "...New Barnet offers an opportunity for additional convenience goods floorspace with a mixed use development on the former gas works site. Whetstone offers opportunities for town centre uses, including convenience goods floorspace and mixed use residential development..." Reason: There is a quantitative and qualitative retail need for additional retail provision in Whetstone district centre. There is a qualitative need for main food shopping in Whetstone to be strengthened, particularly if improvements are made at other centres which influence the centre's market penetration with its catchment area. An analysis of the borough-wide Floorspace Needs Assessment (FNA) highlights that there is substantial retail capacity available in Zones 2, 3 and 4 to support such additional convenience floorspace.	Our evidence base - the Town Centre Floorspace Needs Assessment and Update does not identify a quantitative and qualitative retail need for additional retail provision in Whetstone district centre. The Site Allocations DPD is the appropriate document for site specific considerations in Whetstone.	None
4 3 1	2			Starfield Properties / St James Investments	CS6 Promoting Barnet's town centres (formerly CS4)	We object to paragraph 10.3.1 on retail need, because the borough-wide position on quantitative need hides the fact that the FNA does identify capacity in some parts (zones 2, 3 and 4) of the borough. The reason for this is set out above (see para. 10.6.2 reason). The following wording should be added to the end of paragraph 10.3.1 "...save for where detailed local level analysis of parts of the borough so identifies".	We consider that CS4 promotes competitive town centre environment and provides consumer choice. It does not restrain proposals for local convenience shopping where there is evidence of need.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 3 1	5			Starfield Properties / St James Investments	CS6 Promoting Barnet's town centres (formerly CS4)	We support the realising of development opportunities in the six largest town centres, particularly Whetstone.	We consider that Whetstone no longer merits specific identification as a priority centre. The appropriate way forward will be to adopt a planned approach, probably through a Planning Brief, to any future development opportunities in Whetstone and use the Development Management Policies DPD to consider such proposals	None
4 3 1	6			Starfield Properties / St James Investments	CS6 Promoting Barnet's town centres (formerly CS4)	We consider the maximising of the six priority town centres; support a sustainable pattern of growth whilst protecting the qualities that make Barnet an attractive place to live, work and trade.	We have reduced the number of priority town centres from six to four but they still serve the same purpose. Our response on Whetstone is set out at 431/5 and on New Barnet at 471/24	None
4 3 3	1 3	Georgia	Wrighton	Women's Design Group	CS6 Promoting Barnet's town centres (formerly CS4)	Outlines the key development areas within Barnet which are identified in the London Plan. There is concern within the BWDG regarding the concentration and scale of development and the impact on the sustainability of communities earmarked for growth e.g. Cricklewood. BWDG are also concerned about the impact of the development of large supermarkets and their effect on the viability and sustainability of smaller shopping centres e.g. New Barnet. Why has New Barnet been designated as a District Centre? There is concern that this would provide the 'green light' for harmful new retail development.	Development of Brent Cross Cricklewood has been subject to substantial community involvement. New Barnet has been identified as a district centre in the London Plan and its place within Barnet's network of town centres is clear.	None
4 3 6	5	Robert	Newton		CS6 Promoting Barnet's town centres (formerly CS4)	Reason: The existing wording of Policy CS4 does not reflect Paragraph 2.3.1 and it should. Under Policy CS4, At the end of the first bullet point after the words "office floorspace" add the words "provided that the development does not detrimentally impact on the surrounding existing town centre locations" At the end of the second bullet point after the words "in which it is located" add the words "and is located within the existing town centre envelopes that will not be extended to include adjoining suburban houses." Insert a new third bullet point that reads: "We will ensure that the density of development in town centres complies with and does not exceed that proposed in new density matrix detailed in Policy 3.4, Table 3.2 and Paragraphs 3.22 to 3.25 of the London Plan Consultation Draft Replacement Plan (October 2009) and reflects local context, public transport accessibility and availability of social and other infrastructure." Amend the wording of Paragraphs 10.1.1 to 10.10.2 where necessary to reflect these changes to Policy CS4.	The Development Management DPD will provide further detail on policy for Barnet's town centres and the Site Allocations DPD will bring forward town centre sites.  See response to 436/2 on town centre boundaries.  See response to 436/4 on density matrix.	None
4 3 7	4	P E	Pickering		CS6 Promoting Barnet's town centres (formerly CS4)	First bullet point. The Council should rethink its policy on Brent Cross/Cricklewood which in its present form will damage established town centres in Barnet and neighbouring boroughs, and will generate an unsustainable growth in traffic.	All these issues have been addressed at considerable length in the consideration of the Brent Cross Cricklewood outline application.	None
4 4 0	6			Brent Cross Cricklewood Development Partners	CS6 Promoting Barnet's town centres (formerly CS4)	Paragraph 10.3.1 deals with retail need and capacity for convenience goods and states that there is limited capacity for additional floorspace beyond that in development pipeline. Having reviewed the Town Centre Needs Assessment, which forms the evidence base for retail aspects of the LDF, it is clear that the assessment has included the convenience floorspace component of the BXC development. As such minor alterations are suggested to the text of paragraph 10.3.1 to specifically acknowledge BXC as an existing commitment. The Town Centres Floorspace Assessment..... Limited increases in convenience goods capacity are forecast (up to 5,028 m2 by 2021) and this can be addressed by stores in the development pipeline <u>including Brent Cross Cricklewood</u> .	Agree	Revise supporting text to CS6

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

440	7		Brent Cross Cricklewood Development Partners	CS6 Promoting Barnet's town centres (formerly CS4)	<p>Section 10.5 describes the retail elements of the BXC scheme. Minor updates are recommended to ensure consistency with the application and Development Framework. Furthermore, the Development Partners would also seek confirmation of what the '150,000sq.m' retail figure in paragraph 10.5.1 relates to.</p> <p>Brent Cross - Cricklewood Brent Cross is London's only regional shopping centre and Barnet's largest shopping location, but it is not yet designated as a town centre in the London Plan. <del>Plans are</del> Resolution to grant planning permission is now in place, <del>including specific development proposals</del> to regenerate Brent Cross - Cricklewood.</p> <p>The application proposals comprise a net addition of 55,000 m2 gross comparison retail floorspace as part of town centre north which is equivalent to the quantum established by the adopted UDP. Comparison floorspace to the North will feature up to 61,545 m2 of new floorspace with 6,545 m2 of existing floorspace within Brent Cross Shopping Centre to be decommissioned. <u>In addition, complementary retail services and facilities, including Class A1 convenience floorspace will also be provided north of the A406.</u> <u>The town centre south of the North Circular Road provides a range of services and facilities to serve the day to day needs of the new resident and working population including a food store.</u></p>	Progress on proposals for Brent Cross - Cricklewood is set out in the information box in Section 7. There is no need to duplicate these proposals in the section on Vibrant Town Centres.	Revise information box
440	8		Brent Cross Cricklewood Development Partners	CS6 Promoting Barnet's town centres (formerly CS4)	<p>Policy CS4 deals with retailing and Barnet's town centres and it is suggested that the policy be updated to reflect the details of the application.</p> <p>We will realise development opportunities for the town centres of Edgware, North Finchley, Finchley Church End, Chipping Barnet, New Barnet and Whetstone. We will pursue the individual planning objectives for each centre as set out in their Town Centre Frameworks through the delivery of environmental, design, transport and community safety measures:</p> <ul style="list-style-type: none"> <li>o we will promote Brent Cross / Cricklewood as a new metropolitan town centre and an Outer London Development Centre following successful mixed use regeneration which delivers <u>new retail floorspace services and facilities, including a net additional 55,000m2 (net) of comparison floorspace within town centre north and in the region of 370,000 m2 of office floorspace;</u></li> </ul>	We have revised the policy to reflect the proposals supported by the Development Framework.	Revise CS 6
442	5		British Library	CS6 Promoting Barnet's town centres (formerly CS4)	<p>The BL supports the promotion of successful and vibrant centres throughout Barnet to serve the needs of residents, workers and visitors and ensure that new development is of an appropriate scale and character for the centre in which it is located. The BL welcomes the protection and enhancement of more 'local' neighbourhood centres, and parades of shops, in terms of their potential contribution to sustainable suburbs and shopping. In this context, the BL considers that major new developments, such as the designated growth areas, should be developed to provide shops and services for these new developments. The BL notes that within the CAAP a new neighbourhood centre is proposed, and a new convenience food store of up to 2500 sqm (as part of 5000 sqm of retail floor space) is proposed.</p>	National planning policy statement 4 on Planning for Sustainable Economic Growth sets the policy framework for considering the sequential and impact tests of out of centre development.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 4 3	5			Metropolitan Police Authority	CS6 Promoting Barnet's town centres (formerly CS4)	<p>Policy CS4 deals with uses in Barnet's town centres. The MPA foresees the introduction of place shops in town centres as an integral part of their future estate. They will increase opportunity for the community to interact with police officers and will increase accessibility for neighbourhood policing. Preferably these police shops will be located in town and retail centres where footfall is high and they are therefore easily accessible to the public. A police shop use will add to the vitality of town centres by providing an increased perception of safety and security.</p> <p>Mindful of the above, it is considered that a planning policy basis to support community facilities such as police shops in town centres in LB Barnet would not prejudice the supply of retail floorspace in town centres or the nature of these town centres in the borough. Further, such a planning policy basis complies with London Plan Policy 3A.18 which states policies in DPDs should assess the need for social infrastructure and community facilities, such as policing, in their area. It further states that policies should seek to ensure that appropriate facilities are provided within easy reach by walking and public transport for the population that use them.</p> <p>The following alterations to Policy CS4 is requested</p> <ul style="list-style-type: none"> <li>- We will ensure the efficient use of land and buildings in town centres, encouraging a mix of compatible uses including retail, managed affordable and flexible workspace, community facilities such as policing, leisure and residential that add to the vibrancy of the area whilst respecting character</li> </ul>	We do not require specific reference to police shops. Such facilities fit in within the categories outlined in the policy.	None
4 4 4	1	Cedric	Issac		CS6 Promoting Barnet's town centres (formerly CS4)	Barnet's distinctive town centre Edgware town centre needs a radical re-think. A traffic-free zone from the Edgware bury lane/ hale lane/station road roundabout to the box junction entrance to the Broadwalk centre is an ideal entry and exit for buses and other vehicles. Barnet council should consider pedestrianisation of Edgware and other town centres. Many local authorities have opted for traffic-free zones very successfully. I honestly believe that Barnet council partners are having more influence over its policies than their residents.	Please note that public consultation on the Town Centre Framework for Edgware will provide the opportunity to discuss such proposals	None
4 4 6	1 3	Graham	Saunders	English Heritage	CS6 Promoting Barnet's town centres (formerly CS4)	<p>Generally support the intention of the policy to promote Barnet's town centres, and in particular the commitment to ensure new development is of appropriate scale and character for the centre in which it is located. However we are concerned that neither Policy CS4 nor the supporting text recognises or values the heritage significance of buildings, spaces and townscape features that define many of these centres. In particular we are concerned that the local character and context of these centres of which the historic environment is a key component, is not promoted as an asset to be understood and used when developing a framework for future change. The current wording of the policy and supporting text provides not guidance or commitment to protecting or enhancing the unique characteristics of these centres, especially their heritage assets.</p> <p>Advise that Policy CS4 and its supporting text is revised by explicitly making a link to the value of the historic environment in defining the local character and context of Barnet's centres, and in framing proposals for change. The Characterisation Study should help provide evidence on this suggested policy approach.</p>	We do recognise the heritage value of our town centres and the contribution it makes to them as distinctive places	Revise supporting text to CS6
4 4 9	1			Legal and General	CS6 Promoting Barnet's town centres (formerly CS4)	Delete the words "in order for them to compete with other centres and particularly out-of-centre retail parks and shops" from bullet point 5 under policy CS4 on grounds that there is no justification or evidence for this and this part of the policy is unsound.	PPS4 clearly states that we should proactively plan to promote competitive town centre environments and provide consumer choice.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 4 9	2		Legal and General	CS6 Promoting Barnet's town centres (formerly CS4)	<p>There is no recognition in the Core Strategy of the role and function of the retail parks in providing for larger retail store formats selling 'bulky' type goods ranges. There is also no policy against which proposals for out of centre development will be assessed. These are considered key omissions. Paragraph 13.17 of the borough's Town Centres Floorspace Assessment (April 2009) states that "Retail warehousing provision in LB Barnet also contributes to the comparison shopping offer. The retail parks provide for much of shopper's bulky goods needs." the assessment also indicates (at table 10.3) that the combined turn-over of non-food out of centre retail provision in the borough is in excess of £138m. The retail parks are therefore an important element of the borough's retail provision. Paragraph 10.11.1 of the Core Strategy indicates that the option of "allowing further shopping and commercial town centre related development to meet projected demand in existing out of centre retail parks in Barnet" was shown by the Core Strategy Sustainability Appraisal "to have negative economic, environmental and social impacts. Retail parks are a focus for car-borne shopping and their promotion as a place for growth would impact on congestion. It would also divert investment away from town centres". No evidence is provided of investment being diverted away from the centres. The Core Strategy is not founded on a credible evidence base and unsound in rejecting this option. Much of this reasoning in the Sustainability Appraisal which has led to this option being rejected is predicated on the basis that allowing further retail development at the retail parks will reduce the amount of inward investment to the borough, divert investment away from the centres and undermine development opportunities in the town centres.</p> <p>Despite "development opportunities" having been identified in the centres in the Town Centres Needs Assessment (and referred to in the Core Strategy) the Needs Assessment document recognises that none of these have come forward (paragraph 11.26).</p> <p>The Sustainability Appraisal and its conclusions on this point are poorly founded and show a fundamental misunderstanding of the role of retail parks generally in accommodating large format retail units that cannot be located within physically constrained town centres. Furthermore, if retail warehouses were forced to be located in centres they would comprise large low-density single uses on sites that would be more efficiently and effectively used for far more socially, economically and environmentally beneficial mixed-use regeneration schemes, including new homes. This would run contrary to the principles of PPS1 and the London Plan.</p> <p>Provision of additional retail warehouse floorspace at the existing established retail parks is not investment that would otherwise be made in the town centres. The economics of developing retail warehouse units and the rental levels achievable are entirely different to town centre schemes. Allowing appropriately controlled floorspace additions to the retail parks would not automatically lead to a diversion of investment away from the centres. Furthermore, the retail parks enable substantial levels of expenditure on bulky-type goods such as DIY, decorating goods, furniture and carpets to be accommodated within the borough, rather than outside its boundaries. Growth in non-food spending (incorporating these ranges of goods) in the borough is forecast to be significant. It is more sustainable for this expenditure to be retained within the borough boundaries at established retail locations where there is good opportunity for linked trips that allowing it to go outside the boundaries. The principle of sustainability benefits arising from keeping spending within the borough is accepted by the Sustainability Appraisal (section 11.3.1)</p> <p>New text should be added to the Core Strategy to reflect the role and function of the retail parks in the borough to providing for largely bulky-type retailing (as recognised by the Town Centres Floorspace needs Assessment) that cannot be easily be accommodated within the centres and could undermine regeneration initiatives and delivery of identified development opportunities there. In light of this, a positive (or at least neutral) policy approach should be stated under</p>	<p>PPS4 sets out a clear policy framework for the assessment of out of centre proposals. Through our Development Management Policies DPD we will consider setting floorspace thresholds for requiring impact assessments of edge of centre and out of centre development. PPS4 identifies retail parks as out of town in the sequential approach. This will form the basis for any development decisions.</p> <p>We consider that a low density single use format does not provide consumer choice nor promote changes to the town centres. However it is open to developers to respond to PPS4 and provide more innovative formats.</p> <p>Policy has been revised within the context of PPS 4 and sets our priorities for promoting Barnet's town centres. Retail parks are not our priority and applications for such uses will be considered within the context of the Core Strategy, PPS4 and the London Plan.</p> <p>The Core Strategy is founded on a robust evidence base and is consistent with national planning policy as set out in PPS4. We consider it therefore meets the test of soundness.</p>	None
-------------	---	--	-------------------	--	--	---	------

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 4 9	3		Legal and General	CS6 Promoting Barnet's town centres (formerly CS4)	<p>Excessive weight and reliance is given to the take up of forecast growth in retail expenditure in the borough to 2016 by the Brent Cross Cricklewood regeneration scheme. Although it is noted Barnet Council resolved to grant permission for the proposal on 19th November 2009 and it has development plan support it must still be considered by the Mayor and Secretary of State. The grant of permission and subject to this, the timescales for delivery of meaningful provision of new comparison goods floorspace remain uncertain. The London Borough of Barnet Town Centres Needs Assessment (April 2009) identifies 11,356 sqm of comparison goods expenditure capacity at 2011. This is a very significant amount of floorspace. Paragraph 11.26 of the Assessment identifies no substantive retail-led schemes coming forward in the town centres. A significant amount of this expenditure capacity exists now, but there is no indication of how or where it can be accommodated if the Brent Cross Cricklewood scheme is not approved or implemented. This spending would therefore take place outside the borough which would necessitate trips largely by car. This is unsustainable and highly undesirable. The Core Strategy is not robust and is unsound in this respect.</p> <p>Changes need to be made to the strategy to make it more robust in terms of accommodating the forecast growth in comparison goods retail expenditure. One opportunity for this is to identify an element of growth in floorspace at the existing retail parks. The reasons why this is appropriate and would not automatically undermine investment in the centres are outlined in the other representations made by Legal &amp; General.</p>	<p>We refer to our previous response at 449/2 on retail parks.</p> <p>A policy framework for Brent Cross Cricklewood as set out in the 2005 SPG now forms part of the Core Strategy and sets indicators for delivery of key infrastructure. Retail is the catalyst for this infrastructure. Failure to meet these indicators will trigger a review of the Core Strategy</p>	New policy CS2 on Brent Cross Cricklewood
4 5 1	2		HI (Brent Cross) Ltd	CS6 Promoting Barnet's town centres (formerly CS4)	<p>It is noted that Policy CS4 - promoting Barnet's town centres - covers albeit loosely, hotel and tourism uses. HI (Brent Cross) Ltd acknowledge that the council seek to encourage new facilities within town centres, albeit, there is no policy reference seeking to retain existing sites, such as the Holiday Inn, despite the supporting text stating that 'the market largely determines the need for additional facilities such as cinemas, bingo, bowling, health and fitness and hotels'.</p>	<p>Hotels are identified as a use appropriate for town centres in PPS4. The London Plan also identifies town centres and opportunity areas as appropriate. In line with PPS12 it is not considered necessary to repeat.</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 5 5	2	Mike	Dawson	Finchley Society	CS6 Promoting Barnet's town centres (formerly CS4)	<p>There is a confused policy on the growth of Shopping/Town Centres. Plans for a huge expansion of Brent Cross are in direct conflict with the statement that Town Centres are the most sustainable places for growth. Expansion of Brent Cross will have a significant negative impact on major Town Centres in Barnet and create a large increase in traffic from within and outside the borough. Radial public transport is poor so it is inevitable that the majority of increased traffic will be by car.</p> <p>Reasoning for rejecting one 'option' (Allow further shopping and commercial town centre related development to meet projected demand in existing out of centre retail parks in Barnet) to meet future retail demand suggested at the 'Issues &amp; Options' stage conflicts with allowing the major development of the out of town centre Brent Cross:</p> <p>"The Core Strategy Sustainability Appraisal highlighted that this option would have negative economic, environmental and social impacts. Retail parks are a focus for car-borne shopping and their promotion as a place for growth would impact on congestion. It would also divert investment away from town centres."</p> <p>In DoT, item, 10.5.1: Brent Cross is referred to as London's only regional shopping centre and Barnet's largest shopping location, but it is not yet designated as a town centre in the London Plan. While Barnet's own reasoning rejects enlarging retail parks due to car-borne shopping and the diversion of investment away from town centres, it sets policy to create the biggest shopping centre in London at Brent Cross. This major contradiction in policy must weaken the evidence and sustainability of DoT.</p>	<p>Brent Cross is London's only regional shopping centre and an area of strategic importance. Its regeneration is highlighted in the London Plan and it is not a retail park. These issues were considered as part of the Brent Cross application. The changing role and function of town centres reflects national trends.</p> <p>The Core Strategy seeks vibrancy and vitality in the town centres and provides them with the support to manage change and define roles that reflect their strengths.</p>	None
4 5 5	2 2	Mike	Dawson	Finchley Society	CS6 Promoting Barnet's town centres (formerly CS4)	<p>This principal, managed with care, is welcomed. Extending this policy on the edge of town centre locations for mixed retail/flatted development is not welcome, as viability of retail space in the town centre would be threatened. Unless it can be shown that additional retail space is needed, mixed development on the edge of town centres should be limited to other uses, such as leisure/office/council services.</p>	<p>The policy makes no reference to promoting edge of centre locations. PPS4 sets out a clear sequential approach to town centre development. Policy CS1 has been revised to make it much clearer how it sets the spatial agenda and how the main place shaping policies sit within the Three Strands Approach. Through the Development Management policies we will establish town centre boundaries for major and district town centres. PPS4 makes clear that residential is not a main town centre use. The main town centre uses include retail, offices, cinemas, restaurants, museums and hotels.</p>	None
4 5 5	2 6	Mike	Dawson	Finchley Society	CS6 Promoting Barnet's town centres (formerly CS4)	<p>If the additional 81,024 m2 of comparison goods capacity forecast by 2021 is largely absorbed by the development of a new town centre at Brent Cross Cricklewood, it will adversely affect the town centres of Edgware, North Finchley and Chipping Barnet.</p>	<p>The Town Centre Floorspace Needs Assessment and Update does not identify negative impact from the BXC scheme on the existing town centres.</p> <p>We refer to our earlier response at 455/2</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

						<p>Instead of proposing comparison goods capacity over and above that planned for Brent Cross Cricklewood being absorbed by development opportunities in Edgware, North Finchley and Chipping Barnet, it would be more sustainable to limit expansion of Brent Cross Cricklewood and cater for additional capacity at Edgware, North Finchley and Chipping Barnet.</p> <p>One of the 'Alternative options' not selected is:          "Allow further shopping and commercial town centre related development to meet projected demand in existing out of centre retail parks in Barnet"          This option was rejected because: "The Core Strategy Sustainability Appraisal highlighted that this option would have negative economic, environmental and social impacts. Retail parks are a focus for car-borne shopping and their promotion as a place for growth would impact on congestion. It would also divert investment away from town centres."          Brent Cross shopping centre also causes all the negative impacts cited above as the reason for not choosing meeting future retail demand in existing out of centre retail parks. For these reasons, to create vibrant town centres, most future retail demand must be met by Barnet's major town centres, not Brent Cross.</p>		
4 5 5	2 7	Mike	Dawson	Finchley Society	<p>CS6 Promoting Barnet's town centres (formerly CS4)</p>	<p>We agree with most of the policies mentioned in Policy CS 4. Bullet point one should be amended to read:</p> <ul style="list-style-type: none"> <li>• we will promote Brent Cross / Cricklewood as a new metropolitan town centre and an Outer London Development Centre following successful mixed use regeneration which delivers an additional 35,000m2 (net) of comparison floorspace and 370,000 m2 of office floorspace;</li> </ul> <p>To these policies we consider that major town centres should include:</p> <ol style="list-style-type: none"> <li>i. larger comparison shops of the type found at Brent Cross shopping centre</li> <li>ii. free short-stay car parking of one hour</li> <li>iii. have a 'local' neighbourhood centre</li> <li>iv. have a GP primary care centre</li> </ol>	<p>The Core Strategy is founded on a robust and credible evidence base. Our approach to promoting town centres includes encouraging larger retail units and a parking regime which encourages turnover. We also encourage in Policy CS10 the provision of new community facilities in the town centres, our most accessible locations.</p> <p>The figure of 35,000m2 is unsubstantiated.</p>	None
4 5 8	2	Fiona	Henderson		<p>CS6 Promoting Barnet's town centres (formerly CS4)</p>	<p>Specifically, I consider it absolutely necessary that any future planning guidelines should impose limits on the amount of retail that would be acceptable in New Barnet, rather than leaving developers with the 'carte blanche' of a mixed-use specification. And, in relation to this, I question the methodology of the current retail/floor space analysis; I understand that, should we choose to shop in either the Waitrose in High Barnet, ASDA's in Southgate, or Tesco's in Potters Bar (or Colney Hatch), we are considered to be shopping outside our area. Indeed, this even applies to the East Barnet Road Tesco Express! And what does this document therefore conclude? That, as we are shopping outside our area, we need these (or other retail stores) here in New Barnet!</p> <p>This seems absurd; the majority of supermarket trips are by car and it would not seem unreasonable to travel up to 15 minutes to get to a supermarket, if for reasons of personal preference, you choose not to shop at the one which is less than 5 minutes drive. If we need choice, it, is in the diversity of shops and, more importantly, the range of cultural and leisure activities available to residents. Indeed The LDF consultation paper clearly states (p8. 3.1.12) that 'the amount of retail floorspace in Barnet is one of the greatest in London, exceeded only by Westminster and Kensington and Chelsea.' Any development should respond to a real, not an imagined need.</p>	<p>The Town Centre Floorspace Needs Assessment and Update assesses future needs for the whole borough at an appropriate level of detail to inform the Core Strategy, following a sound methodology.</p> <p>A Town Centre Framework for New Barnet is emerging which will guide future development opportunities within and on the edge of the town centre</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 6 3	1	Chris	Nightingale	Friends of Barnet Market	CS6 Promoting Barnet's town centres (formerly CS4)	<p>"The former market site in Chipping Barnet provides an opportunity to increase comparison goods provision in that centre." As a matter of fact, it is not the former market site. The owners of Barnet Market Ltd (the company that runs the Market) also own the St Albans Road site. Since the 'Direction of Travel' document has been published, the owners have moved the market back onto the St Albans Road site from its temporary site on the Staplton Road car park. The owners have planning permission (valid until November 2010) to redevelop the site to provide for the stall market at ground floor level, flats above and an underground car park below. It follows that, if this redevelopment does take place, the market would have to be moved while the construction work is being carried out.</p> <p>We suggest that the statement is reworded as follows: "The market site in Chipping Barnet provides an opportunity for redevelopment leading to the provision of a permanent home for the stall market."</p>	The Core Strategy recognises the role of markets to our town centres. This support would be considered as part of any decision on the Barnet Market site	None
4 6 3	2	Chris	Nightingale	Friends of Barnet Market	CS6 Promoting Barnet's town centres (formerly CS4)	<p>"..... and we will seek to protect existing markets as part of the retail offer of Burnt Oak, Chipping Barnet and North Finchley town centres and, where appropriate, use S106 contributions to ensure the provision of 'affordable shops' in new retail development." We welcome the policy of protecting existing markets and we propose slight rewording to emphasise that S106 agreements would be used, where possible, to this end.</p> <p>Thus, we propose ".....and we will seek to protect existing markets as part of the retail offer of Burnt Oak, Chipping Barnet and North Finchley town centres and, where appropriate, use S106 (or its successor) contributions to provide suitable permanent sites for these markets and to ensure the provision of 'affordable shops' in new retail development."</p>	The Site Allocations DPD is the appropriate document for site specific considerations. We consider that the Core Strategy highlights the importance of markets to the retail sector and seeks to protect them. Therefore there is no need to highlight markets as a S106 priority.	None
4 6 4	1 0	David	Howard	Federation of Residents Associations in Barnet (FORAB)	CS6 Promoting Barnet's town centres (formerly CS4)	Please protect the Borough's suburban townscapes, safeguard the variety of local retail and business outlets, limit development to flats above business premises within the existing town centre envelopes at a height that complements the neighbourhood. To encourage local shopping free short stay town centre parking should be provided and long stay commuter parking discouraged or sited away from the shopping areas. Getting better public transport and sufficient viable parking is vital to the future of many of the town centres	Our approach to promoting town centres includes encouraging larger retail units and a parking regime which encourages turnover. We also encourage in Policy CS10 the provision of new community facilities in the town centres, our most accessible locations. PPS4 makes clear that residential is not a main town centre use.	None
4 6 4	1	David	Howard	Federation of Residents Associations in Barnet (FORAB)	CS6 Promoting Barnet's town centres (formerly CS4)	Barnet has more town centres than most other London boroughs. It has the second highest number of shops in London. There are more shops now than demand and rationalisation is needed. This must not be imposed from the centre but be addressed by local working parties of traders and residents. Local communities must be an integral part of any rationalisation. The wording for New Barnet for example could be construed as opening the door for a new supermarket which would kill off the rest of New Barnet, much of East Barnet and have a negative impact on Chipping Barnet. Decisions as to whether an existing community is Intensified or enhanced must involve residents in the community and areas further afield who will be affected.	<p>We refer to our previous response on New Barnet at 471/24.</p> <p>The evidence from the Town Centre Floorspace Needs Assessment and Update supports a boroughwide need that should be distributed around Barnet and this does not necessarily equate to a large new supermarket.</p> <p>The changing role and function of town centres reflects national trends. The Core Strategy seeks vibrancy and vitality in the town centres and provides them with the support to manage change and define roles that reflect their strengths. Consultation on Town Centre Frameworks or planning briefs for town centre sites will provide opportunities for more local engagement</p>	Revise CS6 and supporting text

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

464	12	David	Howard	Federation of Residents Associations in Barnet (FORAB)	CS6 Promoting Barnet's town centres (formerly CS4)	We are concerned that there is an emphasis on evening cultures in town centres which is likely to mean pubs and binge drinking and anti social behaviour unless much greater emphasis is placed on alternative social and leisure activities especially for teenagers and the twenties age group plus suitable activities or quality places to eat for the older generations to ensure a balanced mix of users and a safe environment	We consider that that Core Strategy takes a sensible approach to food and drink and entertainment uses in town centres. We will develop further policy in the DM Policies DPD on the diversification of the night time economy in order to enable activity while ensuring community safety.	None
464	22	David	Howard	Federation of Residents Associations in Barnet (FORAB)	CS6 Promoting Barnet's town centres (formerly CS4)	While Brent Cross,/Cricklewood, Colindale, Mill Hill East in particular have been identified as areas for intensification plus the estate regeneration areas of Graham Park, Stonegrove, West Hendon and Dollis Valley we have great concerns at the inappropriate and unsuitable developments that are taking place and that are still being proposed . The new developments mimic high density high rise inner city developments irrespective of where they are in the Borough. The section on Character suggests that developments will have regard to the locality but current experience shows that one size does fit all and it is large numbers of mediocre to poor quality units. The ability of people to relate to the buildings, the human scale, and character of the area is what helps to make a community as opposed to a temporary staging post. While there is a place for modern steel and glass buildings in areas of large scale development such buildings are often out of place in the traditional suburbs. Much of the opposition is to the appearance of the proposed new buildings and the negative impact they will have on the character of the road. One of the reasons for the failing 1970s estates was they were alien to the local environment and never accepted.	The draft London Plan is clear on the use of the density matrix and states that it is not appropriate to apply the table mechanically. We have to be realistic and there are likely to be opportunities for higher density development within the upper range of the matrix in Barnet. Policy CS 5 emphasises the creation of high quality places and sets out our core design principles. We are producing Residential Design Guidance SPD to provide design guidelines for places with a consistent and coherent architectural character as well as those locations where further flatted development will not detract from the prevailing character.	None
465	17	marcus	dickinson		CS6 Promoting Barnet's town centres (formerly CS4)	Encouraging more pedestrians and cyclists	We aim to encourage a mode shift and make public transport as well as cycling and walking more attractive travel options.	None
467	12	Pauline	McKinnell	Cricklewood Community Forum	CS6 Promoting Barnet's town centres (formerly CS4)	But should include all town centres. Golders Green and Cricklewood are getting rundown. All the town centres should be enhanced. All areas should have their distinctive character enhanced e.g. Brent Terrace cottages in NW2. Clitterhouse Farm buildings, Claremont Rd, NW2	All centres are promoted in the policy and a clear hierarchy is set out in the text. We are producing Residential Design Guidance SPD to provide design guidelines for places with a consistent and coherent architectural character as well as those locations where further flatted development will not detract from the prevailing character.	None
467	13	Pauline	McKinnell	Cricklewood Community Forum	CS6 Promoting Barnet's town centres (formerly CS4)	Brent Cross could be developed more on northern and western sides but not as an outer London development centre.	The designation of Brent Cross as an outer London Development Centre is a matter for the London Plan.	None
467	14	Pauline	McKinnell	Cricklewood Community Forum	CS6 Promoting Barnet's town centres (formerly CS4)	What planners see as character may not be same as residents who live there. Just because people live near the north circular or motorway may not mean they want to be concreted over even more	The Characterisation Study will help inform the protection of the suburban character with further policies identified in the Development Management DPD.	None
467	19	Pauline	McKinnell	Cricklewood Community Forum	CS6 Promoting Barnet's town centres (formerly CS4)	Would like to see more markets e.g. farmers markets south of the borough	Although there is no direct reference to the farmer's market in the Core Strategy the London Plan highlights their contribution to the vitality and viability of town centres.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

470	8			Government Office for London	CS6 Promoting Barnet's town centres (formerly CS4)	Policy CS4 (Town Centres) currently suffers from a lack of detail concerning the quantity, location, timing or means of delivery for retail development. This undermines the Core Strategy's effectiveness as a spatial document. It would be beneficial if headlines from the Town Centre Needs Assessment evidence could be drawn into this policy both to aid in adding necessary detail to the policy and providing a better link to the evidence base. We are pleased to note the town centre hierarchy set out in Table 3.	CS6 has been revised to provide more detail on quantity, location and timing of comparison and convenience retail and link with the Town Centre Needs Assessment and Update	Revise CS6
470	9			Government Office for London	CS6 Promoting Barnet's town centres (formerly CS4)	Policy CS4 (Town Centres) point 7 refers to the use of S106 contributions to ensure the provision of 'affordable shops' in new retail development. Clarification of what is meant by this policy would be welcomed and sufficiently robust evidence should be referred to. At the very least, circular 5/05 should be clearly referred to in the policy.	Agree	Reference to Circular 5/05 added to supporting text
471	1	David	Howard	New Barnet Community Association	CS6 Promoting Barnet's town centres (formerly CS4)	NBCA concurs generally with the views set out in the paper by FORAB (attached) in so far as it relates to New Barnet. We also want to see the Town Centre reclassified to reflect the situation on the ground. It is not a District centre and should be classed as a local town centre. As evidence I attach a copy of a letter we have sent to the GLA asking them to redesignate New Barnet. We ask that you also discuss with the GLA the reclassification of New Barnet to a local town centre. We wish to register the following comments regarding the LDF Core Strategy Direction of Travel document and the way in which the proposed policies will have a negative impact on the quality of life in New Barnet.	We refer to our previous response on New Barnet at 471/24. We do not consider that de-designation is the best way forward for a successful New Barnet. We will continue to monitor New Barnet's health as a district town centre.	Revise CS6 and supporting text
471	4	David	Howard	New Barnet Community Association	CS6 Promoting Barnet's town centres (formerly CS4)	Policy CS4 states that you will realise development opportunities in New Barnet yet it provides no details of what those development opportunities include. This policy is far too vague and ambiguous. It should either be made more specific or deleted. We therefore wish you to remove the reference to New Barnet in Policy CS4	We no longer identify New Barnet as a priority town centre in CS6 but do recognise that there are development opportunities. The Core Strategy does not provide a comprehensive list of development opportunities in priority town centres as it is the role of the Town Centre Frameworks to provide that detail.	Revise CS6 and supporting text on Town Centre Frameworks
471	13	David	Howard	New Barnet Community Association	CS6 Promoting Barnet's town centres (formerly CS4)	The Mayor has dropped support for four super hubs including Brent Cross and is supporting a constellation of local town centres based on small scale improvements. This means the excessive proposals for Brent cross should be scaled down and gross overdevelopment of New Barnet town centre be specifically rejected as a policy.	The Mayor's support for super hubs was in advance of the drafting of the Direction of Travel. Brent Cross is identified in the replacement London Plan as a Strategic Outer London development centre with a focus on retail. The identification of opportunities in New Barnet is in line with the Mayor's approach for successful town centres.	None
471	19	David	Howard	New Barnet Community Association	CS6 Promoting Barnet's town centres (formerly CS4)	Para 5.1.11, 6.2.1 (pages 136 and 137) New Barnet is having to fight proposals from ASDA and Tesco because there is a gap in planning policy for the past 10 years or more. Even now we are being asked to comment on the LDF when there is no town centre strategy for New Barnet. This is cart before the horse syndrome. The proposals from both supermarkets are excessive to the point of greed, will overload the infrastructure, gridlock the roads, put local traders out of business and severely damage, not improve or enhance New Barnet, East Barnet and Chipping Barnet.	A Town Centre Framework is being developed for New Barnet which will guide the future of the town centre. The Core Strategy highlights the role of the Town Centre Frameworks	None
471	20	David	Howard	New Barnet Community Association	CS6 Promoting Barnet's town centres (formerly CS4)	Page 138 says it will promote Town centres but the council's present policies and those advocated in the LDF will destroy New, east and High Barnet	Our Core Strategy policy aims to promote town centres based on supporting their strengths as successful places.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

471	25	David	Howard	New Barnet Community Association	CS6 Promoting Barnet's town centres (formerly CS4)	Para 10.1.1 recognizes that each town centre has its own special character. The Tesco proposals for New Barnet would destroy that character and produce nation clonesville. While the ASDA proposals is so alien and of such poor quality as to offend any town centre.	These issues are being addressed through the New Barnet Town Centre Framework. The sites and their preferred uses will form part of the emerging Site Allocations DPD	None
473	2	BJ	McKenny	Whetstone Society	CS6 Promoting Barnet's town centres (formerly CS4)	Naturally, we are particularly interested in the impact on Whetstone, and have examined carefully the comments concerning it as a District Centre. There arises a contradiction. In 10.2.2 Whetstone is referred to as a clean, safe and pleasant place to shop but is then stated to have become more dependant on leisure services and evening economy roles - restaurants, cafes, bars and clubs, a situation, if it were true, brought about by unrealistic rent reviews and failure of the planners to uphold the principles of the old UDP to safeguard the proportion of A1 outlets. Here we would point out that in the recent application concerning the opening hours of the l-bar on the High Road, one hundred and eighteen objections were raised and only one in support - clearly an indication that local residents wish to retain late night peace and quiet. We feel that Whetstone should not have been singled out as suitable for late night activities. Perhaps this could be rectified in the final draft of the core-strategy, as any further loss of A1 outlets in favour of restaurants, take-aways, clubs etc would lead to loss of daytime viability and footfall at the expense of local residents, together with increased noise and disturbances to flat dwellers and others on the high Road and adjacent streets (see Policy CS 4). District centres have traditionally provided convenience goods and services for local communities. Developing capacity of district centres for convenience shopping is critical to ensure goods and services at the local level, and with the recession having an impact on restaurants, take-aways etc there are already signs that day-time activity of A1's is at last showing signs of regeneration e.g. Amey's Kitchenware and Household Goods, together with up-market clothing outlets. We now await the outcome of the final stages of the local development framework and trust that local reactions will be fully taken into account.	The Development Management Policies DPD will address diversification of the night time economy in order to enable a mix of activities for the public realm and to keep town centres safe. The draft London Plan has identified Whetstone town centre as a night time economy of more than local significance.	Revise CS6 and supporting text
477	16	Andrew	Newby	Barnet Green Party	CS6 Promoting Barnet's town centres (formerly CS4)	More should be done to improve the physical attractiveness of these shopping's areas and measures taken to make them more comfortable and secure to shop in, e.g. more pedestrian areas, greater separation of cars and pedestrians (e.g. in North Finchley), design measures to deter anti-social behaviour by gangs or street drinkers.	We seek to redefine the roles of town centres and our Core Strategy policy aims to promote town centres based on supporting their strengths as successful places.	None
478	9	Steven	Deller		CS6 Promoting Barnet's town centres (formerly CS4)	And do nothing for everywhere else. Barnet council has never done anything for Cricklewood and nobody believes you are about to start now. Unless of course it is in Cricklewood where you are more than happy to impose inappropriate scale to a development that will totally dominate existing residents	Cricklewood is an integral part of Barnet and proposals for the regeneration of the area are well established at a borough and London level in the UDP and London Plan. Development of Brent Cross Cricklewood has been subject to substantial community involvement.	None
478	15	Steven	Deller		CS6 Promoting Barnet's town centres (formerly CS4)	A pointless exercise. Local shops will continues to close as a direct result of support for preferred town centres as the will not be able to compete.	Local parades of shops have a different role and function from large town centres. Their contribution to sustainability and community cohesion is recognised in the Core Strategy.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

479	1			Sainsbury's Supermarkets Limited	CS6 Promoting Barnet's town centres (formerly CS4)	Sainsbury's supports the continued growth of District Centres, the scale of development should be appropriate to the role and function of that centre. Development within District Centres should provide access to goods and services at the local level. The amount of additional retail floorspace should be in accordance with the retail hierarchy. Sainsbury's supports the reclassification of North Finchley as a Major Town Centre. In accordance with, Planning Policy Statement 4 (PPS4) (December 2009) policy should allow under certain circumstances out-of-centre development. Whilst the retail needs test is no longer a consideration within PPS4, there may be circumstances where out-of-centre development is appropriate subject to: impact; sequential approach; and scale.	It is not our intention to duplicate PPS4 which sets out a clear policy framework for the assessment of out of centre proposals. Through our DM Policies DPD we will consider setting floorspace thresholds for requiring impact assessments of edge of centre and out of centre development.	None
480	12	Dorothy	Badrick	UKOSF	CS6 Promoting Barnet's town centres (formerly CS4)	How about a proper plan for Cricklewood? inappropriate overdevelopment which any fool can see won't work. back to cricklewood. why are you trying to foist inappropriate overdevelopment on us. if only you would in cricklewood. we get the proposition of huge increases in vehicular traffic on already overly congested roads. and how does this work in relation to the bxdplan? which will surely kill all shopping areas in a five mile radius. if only you would protect clutterhouse playing fields.	We refer to our previous answer at 480/1	None
481	13	David	Dobbs		CS6 Promoting Barnet's town centres (formerly CS4)	I disagree with the entire proposal for Brent Cross/Cricklewood development.	We refer to our previous answer at 480/1	None
481	14	David	Dobbs		CS6 Promoting Barnet's town centres (formerly CS4)	Agreed in principle, but inevitably this is highly subjective and the proposal is too 'roomy' to be meaningful. Why not just say town centres will be developed subject to resource and geographical limits.	Through the Development Management policies we will establish town centre boundaries for major and district town centres.	None
481	16	David	Dobbs		CS6 Promoting Barnet's town centres (formerly CS4)	This wording needs to be strengthened to specifically say what may be considered an inappropriate use or what may be considered subject to full public consultation.	PPS4 sets out the main town centre uses and these are retail, leisure, entertainment facilities, more intensive sport and recreation uses, offices and arts, culture and tourism development.	None
481	19	David	Dobbs		CS6 Promoting Barnet's town centres (formerly CS4)	I suspect that this will lead to an increasing array of low cost retailers which, whilst popular, are of limited attractiveness to the majority of residents.	We will monitor the impact of any 'affordable shops' that we deliver.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

483	12	Maria	Nash	Barnet Women's Design Group	CS6 Promoting Barnet's town centres (formerly CS4)	<p>1) Ensure that the 6 town centres agree to being 'large town centres' 2) Have meaningful engagement with the local community - the commercial, shop/businesses - the users of the centres, women - mothers, single women. Children - teenagers, young adults, vulnerable - elderly and disabled people The framework has to incorporate everyone's views and needs. Local people want to have their area regenerated for their needs not for the financial rewards for Brent Cross Shopping Centre's private company Brent Cross has been led by shareholders of a private company to bully and entice elected members of Barnet to over ride the local residents concerns and issues. The Outer London Development Centre should be at Chipping Barnet where there is enough room to expand and be a link with the counties.</p> <p>All local residents have to be involved in this. Young and old, abled and disabled to be involved. As long as this is not only lead by a private landlord's greed for personal financial reward but a balance that would benefit al mothers with large buggies etc are not considered. The best way to support retail use is to make it accessible in everyway for the weakest residents or visitor and every other resident and visitor would be able to use these town centres easily and safely Transport has to be for Barnet resident's needs not what TFL is prepared to offer. It would save the environment if local people had choice in their local neighbourhood but local shops have to be made fully wheelchair accessible through the Building Regulations Department enforcing Part M to all premises. There should be more opportunity for affordable shops or businesses. Social Enterprises should be incorporated and promoted.</p>	<p>The town centre frameworks are underway and incorporate extensive community engagement in which people can have their say on their town centres.</p> <p>The draft London Plan identifies Brent Cross as an appropriate location for an Outer London Development Centre. Part M can only be enforced in new buildings and when there is an extension to a non domestic property such as a shop.</p>	None
487	9	Michael	Storey		CS6 Promoting Barnet's town centres (formerly CS4)	<p>You'll open the doors to the supermarkets in New Barnet. You claim that there is a shortage of retail provision in the north and east of the borough, but there simply is no evidence for it. Many supermarkets and convenience stores belonging to all the major grocery chains are located a short distance from New Barnet, as can be seen on the linked map (this doesn't include the new Sainsbury's and Tesco's in Chipping Barnet).</p> <p><a href="http://www.newbarnet.org.uk/issues/howmanysupermarkets.php">http://www.newbarnet.org.uk/issues/howmanysupermarkets.php</a></p> <p>Listen to local residents. If they don't want it, don't force it on them.</p> <p>As above, I would agree with the approach. But I think it is hot air and rot. I wouldn't trust the current planning department to protect a single stone or brick of Barnet unless it was the keystone of an architecturally average private development. You don't understand the importance of everyday vernacular architecture, such as can be found in New Barnet, you just want bland new-build See above. If it means building giant superstores in the middle of town centres The ASDA scheme proposed for New Barnet was described by the chair of CABA as "failing on every level: its car focussed and architecturally confused with poor housing tacked on". That scheme was rejected, but given the size of the proposed development area, I suspect the revised application won't be too different. So, I'd want to see evidence of you putting these ideas into practise before I believe it.</p>	<p>Town centres will not survive as centres of commercial activity without investment.</p> <p>A Town Centre Framework is being developed for New Barnet which will guide the future of the town centre.</p> <p>The evidence from the Town Centre Floorspace Needs Assessment and Update supports a boroughwide need that should be distributed around Barnet and this does not necessarily equate to a large new supermarket.</p>	None
487	15	Michael	Storey		CS6 Promoting Barnet's town centres (formerly CS4)	<p>Building huge supermarkets isn't protecting or enhancing New Barnet. Protect our neighbourhood centre and shop parades, and give us a framework which will protect us from gross overdevelopment</p>	<p>We refer to our previous response at 487/9</p>	None
487	16	Michael	Storey		CS6 Promoting Barnet's town centres (formerly CS4)	<p>You have a wretched record as custodians of Chipping Barnet market. Do better.</p>	<p>We consider that the Core Strategy highlights the importance of markets to the retail sector and seeks to protect them.</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

488	20	Glen	Rollings	Greater London Authority	CS6 Promoting Barnet's town centres (formerly CS4)	Although Brent Cross is identified within the draft replacement London Plan as having the potential to become a centre of metropolitan significance, there is no similar mention in the Plan of North Finchley's potential to become a major centre.	Table 3 has been updated accordingly. We have removed the reference to North Finchley to concur with the London Plan.	Revise Table 3
488	21	Glen	Rollings	Greater London Authority	CS6 Promoting Barnet's town centres (formerly CS4)	The section should refer to the night-time economy role of the centre (noted as being of "more than local significance" in table A2.1 of the draft replacement London Plan.	We have added references to Cricklewood and Whetstone to acknowledge their identification in the draft London Plan.	Revise supporting text to CS6
488	22	Glen	Rollings	Greater London Authority	CS6 Promoting Barnet's town centres (formerly CS4)	Information on transport capacity and accessibility has been omitted from section 10.5 Brent Cross Cricklewood. TFL would like to see a reference to transport capacity and accessibility included in this section.	Section 10.5 is specifically about shopping and whilst it is intended that issues of transport capacity and accessibility will be addressed, it is felt that this is adequately covered in other sections, including the amendments made in light of other TFL comments	None
488	23	Glen	Rollings	Greater London Authority	CS6 Promoting Barnet's town centres (formerly CS4)	Potential for additional mixed use and employment provision should be encouraged in accordance with the draft replacement London Plan	We consider that Policy CS4 encourages a mix of compatible uses in town centres that add to the vibrancy of the area.	None
488	24	Glen	Rollings	Greater London Authority	CS6 Promoting Barnet's town centres (formerly CS4)	The role of Barnet's town centres in promoting a healthy night time economy has been omitted.	We consider that Policy CS4 covers the main elements of the night time economy but have added a specific reference to 'a healthy night time economy'.	Revise CS6
	5	John	Dix		CS6 Promoting Barnet's town centres (formerly CS4)	Policy CS4 states that you will realise development opportunities in New Barnet yet it provides no details of what those development opportunities include. This policy is far too vague and ambiguous and in so doing presents loophole for potential developers to do what they want in the area. This policy should either be made more specific or deleted. I would therefore wish you to remove the reference to New Barnet in Policy CS4.	We no longer identify New Barnet as a priority town centre in CS6 but do recognise that there are development opportunities. The Core Strategy does not provide a comprehensive list of development opportunities in priority town centres as it is the role of the Town Centre Frameworks to provide that detail.	Revise CS6 and supporting text on Town Centre Frameworks
P r o f o r m a				New Barnet	CS6 Promoting Barnet's town centres (formerly CS4)	Policy CS4 states that you will realise development opportunities in New Barnet yet it provides no details of what those development opportunities include. This policy is far too vague and ambitious. It should either be made more specific or deleted. Recommendation is that the reference to New Barnet in Policy CS4 should be removed.	We no longer identify New Barnet as a priority town centre in CS6 but do recognise that there are development opportunities. The Core Strategy does not provide a comprehensive list of development opportunities in priority town centres as it is the role of the Town Centre Frameworks to provide that detail.	Revise CS6 and supporting text on Town Centre Frameworks
P e t i t i o n				Save our suburbs	CS6 Promoting Barnet's town centres (formerly CS4)	Protect the Borough's suburban townscapes, safeguard the variety of local and retail business outlets, limit development to flats above business premises within the existing town centre envelopes and provide free short stay town centre parking	Our Core Strategy policy aims to promote town centres based on supporting their strengths as successful places.	None
241	5	Ian	Dubber	Workspace Group PLC	CS7 Enhancing and protecting open space (formerly CS5)	Workspace considers that the implementation of biodiversity measures on-site should be considered on a site by site basis to take account the site and development characteristics	The Development Management Policies DPD will provide further detail on policy for biodiversity.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

2 4 5	1		Higgins Homes PLC	CS7 Enhancing and protecting open space (formerly CS5)	<p>Higgins Homes PLC objects to paragraph 11.2.4 because it incorrectly states that: "Map 5 shows distribution of public open space in the borough". We submit on behalf of Higgins Homes PLC that Map 5 does not correctly identify the distribution of public open space in the borough, and therefore paragraph 11.2.4 is erroneous. Map 5 is incorrect as it identifies land to the rear of existing residential properties at Briarfield Avenue as public open space (see attached drawing AMA1). We object in the strongest possible terms to the identification by Map 5 of this land in green, or annotated in any other way. Land to the rear of Briarfield Avenue does not represent public open space. Land to the rear of Briarfield Avenue is privately owned, by Higgins Homes PLC, and does not provide recognised, well established or unrestricted public access. Land to the rear of Briarfield Avenue does not appear to be publicly accessible when viewed from Briarfield Avenue, Tangle Tree Close, Rosemary Avenue or Dudley Road.</p> <p>Higgins Homes PLC has not allowed unrestricted public access to land to the rear of Briarfield Avenue. Higgins Homes PLC has placed signs on land at Briarfield Avenue to make clear that the land is privately owned. Considerable attempts have been made by Higgins Homes PLC to secure the site. However, the means of enclosure provided on site have either been damaged repeatedly, or removed by unknown parties. Land to the rear of Briarfield Avenue has historically been used, from time to time, by neighbouring residents. A number of neighbouring residents have accessed the land from the end of their private rear gates. The Proposals Map to the UDP, adopted May 2008, does not identify land to the rear of Briarfield Avenue as public open space. Indeed, the adopted UDP does not identify and site specific policies relating to this land.</p> <p>We submit that nothing has changed since the adoption of the UDP in 2006 that would warrant the specific identification of this land as public open space in the Barnet Core Strategy, or any other Development Plan Document. Our submission that land to the rear of Briarfield Avenue should not be identified by Map 5 as open space is supported by the Barnet Characterisation Study, which forms part of the evidence base to the Core Strategy. The characterisation study identifies land to the rear of Briarfield Avenue as character area D (Suburban Terrace). It is notable that the characterisation study does not identify land to the rear of Briarfield Avenue as 'Green Space'</p> <p>In conclusion we submit that identification by Map 5 of land to the rear of Briarfield Avenue as open space is unjustified and unsound.</p> <p>Map 5 should be amended to exclude identification of land to the rear of Briarfield Avenue as public open space. Land to the rear of Briarfield Avenue should not be identified in any way by Map 5.</p>	<p>Map 5 (now Map 11) at A4 size clearly does not allocate new public open space; it merely illustrates the distribution of childrens play facilities within Barnet.</p> <p>The Site Allocations document is the appropriate document to identify any changes to the Proposals Map related to open space.</p>	Introduce new Map 10 on Open Space Deficiency. Revise title for Map 11 to Distribution of Play Space for Children.
-------------	---	--	-------------------	--	---	---	--

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

2 4 5	2		Higgins Homes PLC	CS7 Enhancing and protecting open space (formerly CS5)	<p>Higgins Homes PLC objects to the wording of Policy CS5. As drafted, policy CS5 has considerable scope for misinterpretation and inappropriate application. The following text from policy CS5 is likely to lead to major conflicts in interpretation and use in decision making:</p> <p>'In order to create a greener Barnet we will enhance and protect Barnet's Open Spaces by:</p> <ul style="list-style-type: none"> <li>- Protecting designated open spaces, including Green Belt and Metropolitan Open Land, and other suitable land with the potential to be used as open space.' </li></ul> <p>The wording of policy CS5 above is imprecise as it fails to identify which land will be enhanced and protected. The 'protected designated open spaces' referenced by policy CS5 are undefined, and therefore open to wide ranging interpretation. If it is intended that the 'protected open spaces' are all the spaces identified by Map 5 and/or Map 6 of the Core Strategy document then this should be stated specifically. Higgins Homes PLC has submitted representations objecting to Map 5 and paragraph 11.2.4 of the Core Strategy. Specifically, Higgins Homes PLC objects to the identification of land to the rear of Briarfield Avenue, Finchley as open space. The wording of policy CS5 above which refers to 'other suitable land with the potential to be used as open space' is open to wide misinterpretation. It is unclear whether or not policy CS5 is attempting to protect. Alternatively, this could mean that private land that has and is inaccessible to the public could be protected by policy CS5 as open space. We submit, in the strongest possible terms, that the wording of policy CS5 is unjustified, inappropriate and unsound. Adoption of policy CS5, as currently drafted, is likely to result in at best substantial confusion for landowners or planning applicants and, at worst, inconsistent and poorly formed planning decisions based on imprecise policy wording. On behalf of Higgins Homes PLC we recommend that the following amendments are made to the Barnet Core Strategy Direction of Travel:</p> <p>'In order to create a greener Barnet we will enhance and protect Barnet's Open Spaces by:</p> <ul style="list-style-type: none"> <li>- Protecting [designated] (to be deleted) open spaces [that have unrestricted public access] (in bold), including Green Belt and Metropolitan Open Land [as identified by Map 5 and Map 6 of the Core Strategy] (in bold), [and other suitable land with the potential to be used as open space] (to be deleted).</li> </ul>	<p>The protection of open space does not depend on whether it is accessible to the public.</p> <p>The Site Allocations document is the appropriate document to identify any changes to the Proposals Map related to open space. It still has a contribution to make to a greener Barnet.</p>	None
3 7 4	5		A2 Dominion Housing	CS7 Enhancing and protecting open space (formerly CS5)	<p>Preferred Policy CS 5 states that the LPA will look to meet increased demand for open space and tackle deficiencies and under provision by securing improvements to open spaces including provision for children's play, sports facilities and improvements to access arrangements, where opportunities arise, from all developments that create an additional demand for open space'.</p> <p>When assessing the open space requirements of developments, an assessment of the local context, ignoring administrative boundaries, should be undertaken, and this should be considered alongside the on-site provision within the development. Open space provided within development schemes can often be designed to be multi-functional and satisfy the requirements of a variety of users, not just children and young people. For the above reasons, Preferred Policy CS 5 should be amended to make specific allowances for schemes that provide appropriate on-site provision and sit within an area adequately provided for by open space, regardless of whether</p>	<p>The section on open space has been amended to recognise the multi functionality of open space and to recognise that its contribution is dependent on the local context. Development will not be required to comply with every bullet point in the policy but each scheme will be judged on its merits in the local context.</p> <p>Further detail on implementation will be contained in the Development Management Policies DPD.</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

3 7 7	1			All Souls College	CS7 Enhancing and protecting open space (formerly CS5)	Cluttons LLP submitted representations to the Core Strategy Issues and Options stage on behalf of our clients, All Souls College, Oxford in September 2008. The College owns the Edgware Estate located within the Metropolitan Green Belt from the M1 in the east to land bordering both sides of the A41 in the west. A map highlighting the ownership of the estate was previously submitted with the September 2008 representations. We believe that given the growth pressures on the Borough, the Council should include the provision within policy CS5 to permitting sports and leisure use on appropriate parts of the existing open space network, including land in the Green Belt and Metropolitan Open Land. Such sites can be appropriately maintained and looked after by responsible land owners in the Borough to help serve both existing and projected large future population increases that will occur in the Borough and can enhance the appearance and ecology in the Green Belt. We wish to see Policy CS5 amended by the acknowledgement in the policy wording that allows, in principle, leisure use on open space sites including land in the Metropolitan Green Belt and Metropolitan Open Land, subject to site specific considerations. It is accepted that the third bullet point makes reference to securing improvements to open spaces including provision for children's play, sports facilities and improvements to access arrangements although it is not made clear whether this relates to all forms of existing open space, or only in relation to demand arising from new development in, for example, the identified growth areas.	Appropriate policy will be contained in the Development Management Policies DPD. Site specific opportunities can be identified as part of the Site Allocation DPD. It is clear that we will secure improvements to open space borough wide from developments that create additional demand.	None
4 1 8	3	Julia	Hines	Age Concern	CS7 Enhancing and protecting open space (formerly CS5)	However, we do feel that there should be more accessible green spaces within the development areas than are currently planned. We would also like to emphasise the importance of green spaces in reducing urban heat islands. In the heat wave of 2003 there were 600 extra deaths, most of which were older people. Designing areas of green space allows cooling in hot weather. We would refer you to the work on London's Heat Island published by the Greater London Authority.	Our SPD on Sustainable Design and Construction recognises the contribution of green open spaces to urban cooling.	Add new reference to urban cooling in supporting text to CS 7
4 1 8	8	Julia	Hines	Age Concern	CS7 Enhancing and protecting open space (formerly CS5)	We are concerned that 22 hectares of green space within the development areas is a relatively small amount given the amount of housing proposed. Access to local green spaces is important for health and recreation. Proximity to people's homes is an important factor in encouraging usage.	Delivering new green space is not just about quantity it also relates to quality and access as well.	None
4 1 8	1 2	Julia	Hines	Age Concern	CS7 Enhancing and protecting open space (formerly CS5)	We support the protection and enhancement of Barnet's green spaces and recreational facilities.	We welcome this support	None
4 2 6	1	Pam	Edwards	Barnet Borough Arts Council	CS7 Enhancing and protecting open space (formerly CS5)	The insertion of the word "and festival" after "sports" in the third point on securing improvements.	We recognise that parks serve as a vital focal point for informal and informal community activities including fairs and festivals.	Revise supporting text to CS7
4 2 9	4	Gaby	Kagan	Labour Group	CS7 Enhancing and protecting open space (formerly CS5)	38% of the Borough is in green belt but not all of our green and open spaces are accessible to local residents. The LDF must curb the trend to "privatise" our green and open spaces so that all residents have access to high quality recreation and open spaces, particularly where building densities are higher.	The Development Management DPD will provide policy on the provision of public open space and private amenity space.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

430	6	Dennis	Pepper	Barnet Borough Group London Wildlife Trust	CS7 Enhancing and protecting open space (formerly CS5)	Section 11: Enhancing and protecting Barnet's open spaces demonstrates yet again the restricted view of the function of open/green spaces already noted above. It is important that this is corrected in the revised document, and note the following: People may well prefer an 'attractive, clean and green environment' (11.1.1) but our wildlife requires the conditions in which it can flourish.	The multi functional role of our open spaces including the habitat it provides for wildlife is recognised in the Core Strategy. We refer to our earlier response to 430/2.	Revise 12.6.1
430	7	Dennis	Pepper	Barnet Borough Group London Wildlife Trust	CS7 Enhancing and protecting open space (formerly CS5)	The 'network' of sports and recreational facilities that are apparently 'vital' to Barnet's success as a place to live (11.1.2) should be located well away from the network of SINC's and other sites in which our wildlife can flourish. For example, nature conservation and transmission are essential functions of MOLs and river chains/corridors such as Silk Stream and Dollis Brook. Other (human) activities should be directed elsewhere.	We do recognise the role of habitat corridors for the natural migration of species responding to the changing climate	Revise 12.6.1
430	8	Dennis	Pepper	Barnet Borough Group London Wildlife Trust	CS7 Enhancing and protecting open space (formerly CS5)	It is important that terms such as 'improvement' and 'enhancement' are carefully defined in relation to purpose. For example, the 'enhancement' of Bittacy Park will probably threaten the resident wildlife population just as the developments at Mill Hill East have reduced habitats there. It is far from obvious that human enjoyment should take precedence.	We refer to our previous response at 430/7.	None
430	9	Dennis	Pepper	Barnet Borough Group London Wildlife Trust	CS7 Enhancing and protecting open space (formerly CS5)	We wholeheartedly welcome the support given here to the Mayor of London's intention to give far greater emphasis to the importance of trees and woodland in his emerging London Plan review. We think this further emphasises the importance of Barnet renewing its support for the Watling Chase Community Forest. We think such a policy should be about the retention of existing mature trees (even dead ones have an ecological value) as well as new planting. We note also that ornamental trees have both a limited environmental value and, near highrise building, a relatively short life.	We highlight our support for Watling Chase Community Forest and set out our intention to produce a Green Infrastructure SPD. Our SPD on Sustainable Design and Construction promotes low maintenance indigenous landscaping designed with long term estate management in mind.	Revise supporting text and policy CS 7 to support the Watling Chase Community Forest.
430	10	Dennis	Pepper	Barnet Borough Group London Wildlife Trust	CS7 Enhancing and protecting open space (formerly CS5)	We note that the second bullet point in Policy CS5 is misleading in that while it increases the amount of accessible (to people) open space it reduces the overall amount of green space in each of these areas. It should be dropped from the policy. We also think the Policy should incorporate an intention to providing appropriate habitats and habitat improvements in areas that are not conservation sites. The policy should also emphasize Barnet's intention to ensure that wildlife rich sites are linked for the benefit of species renewal and development.	The figures are an actual net increase of public open space. We consider that the policy supports biodiversity improvements as a consequence of development	None
433	11	Georgia	Wrighton	Women's Design Group	CS7 Enhancing and protecting open space (formerly CS5)	Informal 'pocket parks' and play areas in existing housing areas should be retained, alongside larger more formal spaces taken into account as part of the plan assessment. Sufficient new play and open areas should be provided to meet the needs of communities following new development. Allotments are not recognised or encouraged in the relevant policies and should be as they can be an important provision of open space. In light of the increase in housing provision which will be required over the plan period, allotments can provide important space for those living in properties without gardens giving opportunities for outdoor leisure and educational pursuits, as well as providing a cheap, local, sustainable food source.	The Development Management Policies DPD will set local space standards for public parks and children's play facilities. We aim to increase the number of food growing spaces in Barnet and will utilise mechanisms such as capital growth which offer financial and practical support for community farming to identify to identify new opportunities for the development of new spaces.	Revise supporting text and policy CS 7 to support the Mayor's Capital Growth Initiative

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 3 6	6	Robert	Newton		<p>CS7 Enhancing and protecting open space (formerly CS5)</p>	<p>Reason: The existing wording of Policy CS5 does not reflect Paragraph 2.3.1 and it should. Under Policy CS5</p> <p>Re-write the first Bullet point to read "Giving absolute protection to designated open spaces including Green Belt and Metropolitan Open Land and additionally designate further areas for absolute protection such as the proposed open space fronting Granville Road and Bow Lane adjoining the proposed new Finchley Memorial Hospital and other valued open space to include parks, public and private playing fields, public and private amenity open spaces and the Borough's allotment sites"</p> <p>Re-write the second bullet point to read: "Securing additional onsite open space and recreational provision that meets the national standards of provision within the identified growth area and does not 'borrow' open space from adjoining areas so as to allow an increased density of development within the growth area as at Mill Hill East and Colindale."</p> <p>Under the fourth bullet point, after the words "sports facilities" in the second line insert the words "additional allotment sites," and after the word "for open space" in the third line add the words "and leisure and recreational facilities."</p> <p>Under the fourth bullet point, after the words "green space, trees and hedgerows" add the words "by identifying and scheduling them and safeguarding them through the development control, planning enforcement, open space management and other administrative functions."</p> <p>Under the fifth bullet point, after the words "biodiversity in Barnet" add the words "and ensuring compliance with statutory and case law safeguards within the development control, planning enforcement, open space management and other administrative functions."</p> <p>Add a seventh bullet point that reads: "Amending to the Local Development Scheme to include the production of a 'Trees and Development Supplementary Planning Document' that it is understood the Council has already drafted." [Note: See Norwich City Council 'Trees and Development SPD]. Amend the wording of Paragraphs 11.1.1 to 11.7.1 where necessary to reflect these changes to Policy CS5.</p>	<p>Not necessary to add the word absolute as designated open space protected by policy. The Site Allocations DPD presents the opportunity to conditionally designate further areas of open space but our policy already offers protection for other suitable land with potential to be used as open space.</p> <p>On the basis of evidence in the open space, sport and recreational facilities needs assessment we will set quantitative standards for open space in the DM policies DPD.</p> <p>Provision of leisure and recreation facilities are addressed in our policy on Enabling Integrated Community Facilities and uses.</p> <p>Given our significant and well used allotment holdings and extensive former agricultural land we are keen to promote sustainable local food production. We are supportive of the capital growth initiative to increase the number of food growing spaces in Barnet.</p> <p>The suggested wording on the fourth and fifth bullet points is unnecessary and unstrategic. The Core Strategy does not have to reiterate our statutory responsibility for biodiversity, trees, hedgerows and green spaces.</p> <p>We are producing a SPD on Green Infrastructure which will provide guidance on landscaping, trees, biodiversity and sustainable urban drainage systems.</p>	<p>Revise LDS to set out new SPD on Green Infrastructure</p> <p>Revise supporting text to CS7 to highlight benefits of community farming</p>
4 3 9	5	Zenda	Green	Mill Hill Preservation Society	<p>CS7 Enhancing and protecting open space (formerly CS5)</p>	<p>Policy CS5 - Enhancing and protecting Barnet's open spaces (P54) needs greater clarity on what open spaces will actually be protected and enhanced. The Three Strand Approach commits in Strand 1 to 'Absolute Protection of the Green Belt, Metropolitan Open land and other valued open space' but the policy is not clear on other land that will be protected. It is also weak on enhancing the existing stock of spaces, suggesting improvements will be made only 'where opportunities arise'. Map 5 (P55) has been prepared in support of this policy but it needs greater clarity on what is protected and where new provision will be made.</p>	<p>The Core Strategy is clear in the principle of protecting open space. Further policy will be contained in the Development Management DPD. Green Belt and MOL are identified on the proposals map and have strong policy protection through PPG2. We can only improve open space provision where opportunities arise. This is a realistic approach.</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

440	9			Brent Cross Cricklewood Development Partners	CS7 Enhancing and protecting open space (formerly CS5)	<p>Policy CS5 suggests that BXC will deliver 11.27ha of open space, which is not consistent with the application proposals, in particular Section 2 of the Development Specification &amp; Framework. The minor updates are therefore suggested:</p> <p>In order to create a greener Barnet we will enhance and protect Barnet's Open Spaces by:</p> <p>protecting, <u>where appropriate</u>, designated open spaces, including Green Belt and Metropolitan Open Land, and other suitable land with the potential to be used as open space.....</p> <p>securing additional on-site open space or other open space improvements in the identified growth areas including <del>41.27ha</del> <u>a net additional increase of 8ha</u> of new provision at Brent Cross – Cricklewood, .....</p>	We have revised the section to reflect the provision of new open space as part of the Brent Cross - Cricklewood proposals. We consider the wording 'where appropriate' to significantly weaken the policy on protecting open space.	Revise CS7
446	14	Graham	Saunders	English Heritage	CS7 Enhancing and protecting open space (formerly CS5)	<p>Support in general the policy to enhance and protect Barnet's open spaces. However neither Policy CS5 nor the preceding supporting text (paragraphs 11) recognise the heritage value of many of Barnet's open spaces. For example many of the open spaces identified form part of or are designated assets such as registered historic parks and gardens, or form part of the special character of a conservation area or setting of a listed building. We would advise that the heritage value of the Borough's open spaces is recognised, protected and enhanced in the wording of Policy CS5 and its supporting text in order for it to be compliant with national guidance.</p>	Agree	Revise supporting text to CS 7 to highlight heritage value of parks and gardens.

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 4 8	1	MR AND MRS	LEVENE	<p>CS7 Enhancing and protecting open space (formerly CS5)</p>	<p>As confirmed in representations made to the Issues and Options consultation, the Core Strategy should include some provision for the review of MOL designations within the Borough to allow sites, where appropriate, to be "Three Strands Approach" seeks the "Absolute protection of the Green Belt, MOL and other valued open space from inappropriate development". Policy CS5 goes onto state that "in order to create a greener Barnet, we will Enhance and protect Barnet's open spaces by "protecting designated open spaces, including Green Belt and MOL, and other suitable land with the potential to be used as open space".</p> <p>These objectives are fully supported. Policy CS5 of the Core Strategy, or supporting text to the Policy, should set out how and when a review of MOL will be undertaken in order that there is appropriate opportunity to rigorously assess existing designations and, where appropriate, amend the MOL boundaries and release sites which do not meet the criteria for such designation. Alternatively, in relation to small individual sites within the MOL, the Core Strategy should confirm that individual assessments should be carried out as part of the Site Allocations DPD. Released where they do not meet the requisite criteria as suitable for such designation. Strand 1 of the Council's However, in accordance with representations made to the Core Strategy Issues and Options consultation, serious concerns remain that the Core Strategy fails to include provisions for the review of MOL boundaries. London Plan Policy 3D.10 states that "any alterations to the boundary of MOL should be undertaken by Boroughs through the DPD process".</p> <p>It is appropriate for the Core Strategy or at the very least the LDS, to set out how review of MOL will be undertaken and it is considered important to allow for the opportunity to rigorously assess existing designations and where appropriate release sites which do not meet the criteria for such designations. For example, land at 1 Indigo Walk, located adjacent to Cherry Tree Woods, East Finchley, is currently included within the MOL designation which covers this area of public open space. No.1 Indigo Walk, however, is a private residence which, unlike every other residential property which abuts the Woods, has been included within the MOL designation even though it does not perform any of the functions expected of sites so designated. Accordingly, the Core Strategy should make provision for the review of boundaries as indicated above to ensure that it comprises an effective and robust policy. Policy CS5 of the Core Strategy, or supporting text to the</p> <p>Policy, should set out how and when a review of MOL will be undertaken in order that there is appropriate opportunity to rigorously assess existing designations and, where appropriate, amend the MOL boundaries and release sites which do not meet the criteria for such designation. Alternatively, in relation to small individual sites within the MOL, the Core Strategy should confirm that individual assessments should be carried out as part of the Site Allocations DPD.</p>	<p>The Site Allocation DPD is the appropriate document in which to consider changes to the boundary of MOL.</p>	None
-------------	---	------------------	--------	---	---	---	------

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 5 2	1	Lisa	Walduck	Natural England	CS7 Enhancing and protecting open space (formerly CS5)	<p>Although we are supportive of protecting and enhancing open spaces in the borough, at present the Core Strategy appears to view such spaces in isolation. In order to maximise the benefits that open spaces can deliver, it is vital that they are considered as a network. We therefore recommend that this policy is revised and expanded to address green infrastructure.</p> <p>Green infrastructure is the network of green spaces, places and features that thread through and surround urban areas and connect town to country. This includes public and private spaces, such as parks, gardens, allotments, cemeteries, trees, green roofs and natural habitats such as woodlands, grasslands and wetlands.</p> <p>The benefits of green infrastructure are often described as 'ecosystem services'. This technical term has emerged internationally to express the many ways in which a functioning natural environment supports life.</p> <p>Natural England's London region has developed a paper which sets out four guiding principles which should be considered when planning green infrastructure. We recommend that you read this paper and revise policy CS5 to better reflect the need to deliver a functioning green infrastructure in the borough. It should be noted that the paper has been produced to provide guidance, and is not a published Natural England statement.</p>	We recognise the value of green infrastructure in Barnet and plan to produce a Green Infrastructure SPD..	Revise CS 7 and supporting text including new section 12.6 on Green Infrastructure and the Green Grid. Revise LDS to introduce new SPD on Green Infrastructure
4 5 2	2	Lisa	Walduck	Natural England	CS7 Enhancing and protecting open space (formerly CS5)	Policy CS5 states that Metropolitan Open Land will be protected. However, this may preclude opportunities to enhance areas of MOL which are currently poor and which could be improved. We would support a policy which aims to improve the quality of MOL.	The policy refers to improving open spaces which cover all open spaces including MOL.	None
						There are small areas of the borough which lie in the GLA's defined areas of deficiency in access to nature. In order to address this issue, we recommend that the policy explicitly addresses the need to reduce these areas of deficiency, and that the LDF provides guidance on how this should be achieved.	The Development Management Policies DPD will provide further detail on addressing areas of deficiency in access to nature.	
4 5 4	1	Katie	Arthur	Environment Agency	CS7 Enhancing and protecting open space (formerly CS5)	<p>We support Policy CS 5 and are particularly pleased with the second to last bullet point: 'ensuring that development protects existing site ecology and makes the fullest contributions to enhancing biodiversity, both through on-site measures and by contribution to local biodiversity improvements'</p> <p>Suggested Improvements: The policy could be improved by adding to the above point 'including the protection and improvement of watercourses'. This would then help to meet Policy 4C.3 of the London Plan without repeating its content.</p>	We welcome this support and have revised policy to add reference to protection and improvement of water courses.	Revise CS 7
4 5 5	2	Mike	Dawson	Finchley Society	CS7 Enhancing and protecting open space (formerly CS5)	<p>We are concerned that the original 'Three Strands Approach' to protection of Green Belt and Metropolitan Open Land is not repeated in Policy CS5 and CS1. We wish for absolute protection of Green Belt and Metropolitan Open Land and associated spaces as set-out below: CS 5, first bullet point: • protecting designated open spaces giving absolute protection, including Green Belt and Metropolitan Open Land and other suitable land with the potential to be used as open space. This to include parks, public and private playing fields, public and private amenity open spaces and the Borough's allotment sites. Second bullet point: • Securing additional onsite open space and recreational provision that meets the national standards of provision within the identified growth area and does not 'borrow' open space from another site.</p>	Not necessary to add the word absolute as designated open space protected by policy. For clarification see PPG 2 Green Belts. On the basis of evidence in the open space, sport and playing pitch needs assessment we will set quantitative standards for open space in the Development Management Policies DPD.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

460	1	PE	Pickering	hendon and district archaeological society (HADAS)	CS7 Enhancing and protecting open space (formerly CS5)	<p>The comments all relate to matters omitted from, or dealt with much too cursorily in, the document. We note the references to the character of Barnet and its historic environment in the document. They are welcome so far as they go, but they do not go anything like far enough, and should have a chapter to themselves (as the natural environment has in Chapter 11) or at least a separate section in Chapter 9.</p> <p>This chapter or section should, in particular, outline the council's policy on conservation areas (as the UDP did in Policies HC1 and following) and on the 'local listing' (as it is currently termed) of buildings of importance to the borough's heritage and townscape character - as the UDP did in Policies HC14 and 15. It should also mention the wealth of nationally listed buildings which Barnet enjoys - Barnet is, I believe, very high in this league table among outer London boroughs. Examples of policies on these matters which Barnet could usefully emulate are in Policy 9B of the draft Core Strategy of Islington, and in SP10 of the Tower Hamlets Core Strategy. Archaeology in the narrower sense makes even less of an appearance in the 'Direction of Travel' document - indeed I have found none at all. This must be rectified, and it must be made clear to the people of Barnet and to developers that the Council will insist on proper archaeological investigations in advance of any development where it seems possible that there are buried remains, and that the results of any investigations will be made public.</p> <p>Including Archaeological Priority Areas in one of the maps would be very helpful. Another omission is of museums. There are two perfunctory mentions, one of Church House Farm Museum in the context of the library estate, and the other of the RAF Museum in the Colindale box in Chapter 7. One would not guess from this that the RAF Museum is a National Museum which the Council should be proud of having within its area. Nor is there even a mention of other museums, such as the Barnet Museum in Wood Street and the Stephens Collection in Avenue House. This contrasts pointedly with the several paragraphs devoted to the various types of open space. Although not really within HADAS's remit, the document appears to neglect culture and the arts completely (there is not even a mention of the Arts Depot in North Finchley, let alone the various smaller arts centres). Surely they are significant in land use terms, and in making Barnet rather more self-contained, and not a mere dormitory suburb whose inhabitants look to centr</p>	<p>We refer to our response at 426/6 on arts and culture</p> <p>The Core Strategy highlights its heritage at 4.2.1. Policy CS 5 refers to protecting and enhancing Barnet's heritage including the Battle of Barnet site. Further policy will be included in the Development Management Policies DPD on heritage and archaeology but a new chapter in the Core Strategy is not considered appropriate.</p>	<p>Revise CS5 and add new para 4.2.1</p>
464	9	David	Howard	Federation of Residents Associations in Barnet (FORAB)	CS7 Enhancing and protecting open space (formerly CS5)	<p>It is essential that there be strong measures to protect our trees and wildlife and save our back gardens and back-land from development. We are concerned at the pernicious intrusions into green belt and MOL through sports facilities, schools, golf ranges and the like, Improved guidance on Front/side garden conversions to car parking is required in order for some planting to be maintained</p>	<p>We do recognise the importance of protecting gardens for biodiversity and sustainability as well as local character however without draconian measures we are unable to prevent residents exercising their rights through permitted development to make minor alterations to their properties front and back gardens.</p> <p>We are producing a SPD on Green Infrastructure which will provide guidance on landscaping, trees, biodiversity, green roofs and sustainable urban drainage systems.</p>	<p>Revise LDS to introduce new SPD on Green Infrastructure</p>
467	20	Pauline	McKinnell	Cricklewood Community Forum	CS7 Enhancing and protecting open space (formerly CS5)	<p>All green spaces should be protected. They are essential to our health.</p>	<p>We welcome this support. We make clear links in the Core Strategy between health and provision of open spaces.</p>	<p>None</p>

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 7 4	1	G	Jardine	Greensquare Residents Association	CS7 Enhancing and protecting open space (formerly CS5)	Page 54, the map marked 5 should refer to Barnet's Green Spaces and Play Areas being of prime importance.	The policy provides this recognition and protection	None
4 7 4	2	G	Jardine	Greensquare Residents Association	CS7 Enhancing and protecting open space (formerly CS5)	Para 11.3, page 53 we suggest the words: "and informal play spaces" be added the word "formal" as children will often use the areas marked on Plan 5, some of which are natural tree, grass and tree cover as play facilities.	It is recognised that children will benefit from other spaces but provision of formal play equipment is a priority.	None
4 7 8	1 7	Steven	Deller		CS7 Enhancing and protecting open space (formerly CS5)	Unless it's Claremont Stadium where you have sought to do the exact opposite by overturning this provision in the covenants and taking local residents to court for objecting	This is a specific matter connected with planning consent for Hendon FC.	None
4 7 8	1 8	Steven	Deller		CS7 Enhancing and protecting open space (formerly CS5)	So why break up the existing open spaces in Cricklewood and replace them with smaller areas	These issues were addressed as part of the Brent Cross Cricklewood planning application considered by committee on 16 November 2009	None
4 8 1	2 0	David	Dobbs		CS7 Enhancing and protecting open space (formerly CS5)	This needs to be more specifically worded to be meaningful.	We consider that the approach to protection of open space is clear.	None
4 8 2	1	Claire	McAlister	British Waterways	CS7 Enhancing and protecting open space (formerly CS5)	<p>Vision and Objectives The vision and sub ambitions identified here can all help to be supported by improved access and facilities at the Brent Reservoir. In February 2009 the Department of Health published the Physical Activity Plan for England "Be active, be healthy: a plan for getting the nation moving", which makes reference to the benefit of the waterways and other open space for informal and formal recreation  <a href="http://www.dh.gov.uk/en/publicationsandstatistics/publications/publicationspolicyandguidance/dh_094358">http://www.dh.gov.uk/en/publicationsandstatistics/publications/publicationspolicyandguidance/dh_094358</a></p> <p>Barnet's Core Objectives We support the final objective that seeks to enhance and protect Barnet's green and natural open spaces, and feel that the Brent Reservoir should be mentioned here, so that its potential for leisure and recreation, tourism, education, biodiversity etc can be fully utilised.</p> <p>11 Enhancing and Protecting Barnet's Open Spaces Map 5 and 6 The Brent Reservoir should be highlighted on these maps as a visitor attraction and local public amenity space, as well as an area where regeneration/restoration would enliven and activate the waterspace, helping to support the Core Strategy Objectives. In addition, we would like to reiterate previous comments submitted as part of the Issues and Options consultation: The sailing club building to the north east of the reservoir, by Cool Oak Lane Bridge, is leased to the Council and currently vacant and falling into disrepair. BW would be pleased to see this reopened and brought back into use, to provide enhanced access to the reservoir as a public resource and increase leisure opportunities. We are aware that the Metropolitan Housing Trust was previously involved in a joint venture with the Council to redevelop/refurbish the West Hendon Estate. BW would support this, to include the refurbishment and reopening of the sailing club building, and the land to the north, which I believe is known as 'Area 10'. This would help to improve access to this potentially valuable open space and public resource, as well as providing the opportunity to improve biodiversity within this SSSI.</p>	<p>We recognise the importance of Welsh Harp / Brent Reservoir in terms of biodiversity, leisure and recreation.</p> <p>The future of Area 10 is an issue best addressed through the Site Allocations DPD.</p>	Revise map of natural spaces to highlight watercourses and Welsh Harp / Brent Reservoir Add ref to Reservoir at 4.9.3

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

483	20	Maria	Nash	Barnet Women's Design Group	CS7 Enhancing and protecting open space (formerly CS5)	Local people to lead on this issue through Local Agenda 21 groups	As part of our Future Shape programme we are encouraging greater self-help and community leadership	None
483	21	Maria	Nash	Barnet Women's Design Group	CS7 Enhancing and protecting open space (formerly CS5)	There should be new allotments created not only the existing allotments protected to encourage more local food produced and better eating habits encouraged by people growing their own food	We aim to increase the number of food growing spaces in Barnet and will utilise mechanisms such as capital growth which offer financial and practical support for community farming to identify to identify new opportunities for the development of new spaces.	Revise supporting text to CS7 to highlight benefits of community farming
485	19	Robert	Shutler	Woodside Park Garden Suburb Residents Association	CS7 Enhancing and protecting open space (formerly CS5)	A blanket policy like this is a recipe for non-creative thinking especially as most of the green belt is used by an extreme minority of the people. There is more than enough open space in Barnet (although much of it is in the wrong areas) and the only areas that need protection are the conservation areas and Woodside Park. There are many areas of MOL which should be taken out of MOL status and this land should be brought back into some form of proper use.	The Core Strategy is clear in the principle of protecting open space. Further policy will be contained in the Development Management Policies DPD.	None
488	25	Glen	Rollings	Greater London Authority	CS7 Enhancing and protecting open space (formerly CS5)	The policy should refer to the aims of the Mayor's Blue Ribbon Network in protecting and improving the quality of watercourses and their surrounding spaces. The policy should also support improved access to open spaces by all residents of the borough.	We have identified Barnet's rivers in the Blue Ribbon Network and referred to the policies in the London Plan at paragraph 12..5.2.	Revise map of natural spaces to highlight watercourses and Welsh Harp / Brent Reservoir
Petition				Save our suburbs	CS7 Enhancing and protecting open space (formerly CS5)	Give absolute protection for small open spaces and allotments along with Green Belt, Metropolitan open Land and parks.	Not necessary to add the word absolute as designated open space protected by policy and our policy already offers protection for other suitable land with potential to be used as open space.	None
Petition				Save our suburbs	CS7 Enhancing and protecting open space (formerly CS5)	Save our back gardens from backland development	We do recognise the importance of protecting gardens for biodiversity and sustainability as well as local character	None
240	2			Universities Superannuation Scheme (USS)	CS8 A strong and prosperous Barnet (formerly CS6)	USS agrees with this policy as it seeks to promote growth and to provide the opportunity for economic advancement. USS are pleased to note that Capitol Park falls within the Colindale AAP and is designated within the Edgware Road Corridor of Change which seeks to provide a mix of appropriate uses in the area including commercial activity. USS encourages the council to promote Colindale as a growth area and support businesses particularly within Finchley and Colindale. USS urges the council to consider maintaining the flexibility of business uses and supporting services within these areas.	We welcome this support. CS 8 provides the policy basis for supporting businesses and this includes responding to their needs.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

2 4 1	6	Ian	Dubber	Workspace Group PLC	<p>CS8 A strong and prosperous Barnet (formerly CS6)</p> <p>Workspace objects to the safeguarding of existing employment sites throughout the borough for Class B uses. Workspace considers that this policy should promote economic development as defined by draft PPS4, which includes Class B uses but also includes developments that: provide employment opportunities; generate wealth; and produces or generates an economic output or product. Consequently, the council should allow for the change of use of sites for non-class B uses that generate economic development. This approach is important for long-term economic development of the borough. Indeed, workspace has experienced changes in types of business activities and floorspace demand from the occupants of its property portfolio and has noticed a shift away from the requirement for traditional Class B floorspace. There has been a long and well established trend of decline in the demand for industrial accommodation throughout London. Workspace considers that the protection of existing employment sites for such uses in Barnet</p> <p>Workspace considers the council has not sufficiently considered the redevelopment of existing employment sites. Workspace considers that the council should promote the redevelopment of inefficient employment areas for mixed use developments that incorporates modern and flexible employment floorspace. New employment floorspace will help sustain existing employment use at such sites and enables sufficient flexibility and building quality to secure its continued use in the longer term. This will provide benefit in employment and economic terms through continuing to provide opportunities for a wide variety of small and medium sized businesses. The associated housing development as a part of a mixed use development will secure the delivery of this employment floorspace. Without the housing element the redevelopment could be unviable.</p>	<p>PPS4 recognises the role of mixed use developments in facilitating economic development however it also recommends that we should where necessary safeguard land from other uses to facilitate a broad range of that economic development. PPS4 retains the requirement for an assessment of land and the Employment Land Survey provides this to support policy CS8. The Development Management Policies DPD will provide further detail on policy for existing employment sites in relation to mixed use. The Site Allocations DPD is the appropriate document for site specific considerations.</p> <p>We consider that Policy CS8 is responsive to the needs of modern business and therefore promotes economic development in line with PPS4.</p>	None
-------------	---	-----	--------	------------------------	--	---	------

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

2 4 1	7	Ian	Dubber	Workspace Group PLC	<p>CS8 A strong and prosperous Barnet (formerly CS6)</p> <p>Consequently Workspace considers that the council should allow the redevelopment of employment sites when mixed use development is proposed that incorporates residential uses and modern employment use. Workspace supports the encouragement of mixed-use developments in the larger town centres that include commercial floorspace. Workspace considers that the council should promote mixed-use development in other locations across the borough including through the redevelopment of existing under-used sites. Workspace supports the promotion of small and medium sized commercial floorspace. Indeed Workspace actively provides affordable and flexible workspaces for these business types. Workspace considers that new commercial buildings need to be flexible to meet future business needs and that a range of unit sizes are required including accommodation suitable for small and medium sized enterprises. However, Workspace considers that this policy should not restrict the promotion of small and medium sized enterprises throughout the borough</p> <p>Workspace supports the promotion of employment and training schemes. Workspace considers that this policy should support the development of employment and training facilities within existing employment sites. Consequently the existing employment sites should not be restricted to Class B uses. Recent government initiatives that seek to increase training facilities and raise the workforce's skills levels have increased demand for Class D1 floorspace. There is a need for strong linkages between this Class D1 floorspace and existing businesses and can only be achieved by locating these uses in close proximity to each other on existing employment sites.</p> <p>Workspace supports the promotion of employment and training schemes. Workspace considers that this policy should support the development of employment and training facilities within existing employment sites. Consequently the existing employment sites should not be restricted to Class B uses. Recent government initiatives that seek to increase training facilities and raise the workforce's skills levels have increased demand for Class D1 floorspace. There is a need for strong linkages between this Class D1 floorspace and existing businesses and can only be achieved by locating these uses in close proximity to each other on existing employment sites. Workspace considers it important that the provision of student homes and long-term needs of the local colleges and universities are met. It is important that the council support the local universities as they are a major source of employment and are providing the essential skills to the future workforce of the borough. It is also important to promote linkages between existing businesses and the universities to stimulate economic growth.</p> <p>Such an approach would accord with the draft PPS4. Workspace considers that any S106 contributions for employment and training initiatives should be applied on a site by site basis and adhere to the requirements of Circular 05/2005. Planning obligations must only be imposed when it can be demonstrated that they are needed for to mitigate against the impact of the development and should not make a redevelopment scheme unviable.</p>	<p>We clearly state in the Core Strategy that Town Centres are our preferred location for mixed use development and this is supported by PPS4. Training facilities should be provided in accessible locations in order to reduce the need to travel. Barnet's Town Centres are appropriate locations as we seek to redefine their roles based on functions that will support vibrancy. However locating such D1 class uses in employment areas could lead to future impacts on existing uses and would not be appropriate.</p> <p>We highlight our close working relationship with strategic partners such as Middlesex University and Barnet College in helping residents to access work. Agreed that planning obligations should be in accordance with Circular 05/2005</p>	None
-------------	---	-----	--------	------------------------	--	---	------

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

3 7 4	6			A2 Dominion Housing	CS8 A strong and prosperous Barnet (formerly CS6)	Preferred Policy CS 6 identifies that the Council will 'safeguard existing employment sites that meet the needs of modern businesses. However, mixed use development including residential as a replacement for employment uses can improve the viability of a scheme. It should be noted that one of the key themes of PPS4: Planning for Sustainable Economic Development is to achieve a proper balance between economic opportunities and environmental and social issues, and that the definition of economic development now includes a wide range of development options. With this in mind, the Council should apply the appropriate flexibility when considering the best use of a site, and that in the right circumstances, sustainable residential development can make the best economic re-use of a site. More specifically, Preferred Policy CS6 should be amended to make specific reference to the fact that the Brent Cross Cricklewood Regeneration Area Framework SPG (2005) in the instance of the former Parcel force Depot on Edgware Road, and in other cases other more specific guidance has already determined that certain employment sites should be redeveloped for non-employment uses. Preferred Policy CS 6 also identifies that the Council will support Barnet residents in accessing work through 'requiring major developments to provide financial contributions and to deliver employment and training initiatives in line with the Skills Development Plan'. Whilst our client encourages the improvement of skills in the Borough, it should be recognised that some developers including A2 Dominion Housing already source local labour and provide construction skills as part of their corporate responsibility. As such, Preferred Policy CS 6 should make specific reference that any financial contribution should not be required or reduced to reflect the benefits that the developer will provide as a matter of course.	PPS4 recognises mixed use developments role in facilitating economic development. PPS4 also recommends at EC2(h) that we should where necessary safeguard land from other uses to facilitate a broad range of that economic development. PPS4 retains the requirement for an assessment of land. Barnet's Employment Land Survey provides evidence of the need for employment land. The Development Management Policies DPD will provide further detail on policy for existing employment sites in relation to mixed use. The Site Allocations DPD is the appropriate document for site specific considerations. The Core Strategy has introduced a new policy on Brent Cross Cricklewood to clearly set out the planning framework for the area. We do recognise that some major developments are making these contributions and this will be factored into negotiations. However this does not merit a change to policy.	Introduce new policy CS2 on Brent Cross – Cricklewood
3 7 9	0			Asda Stores Ltd	CS8 A strong and prosperous Barnet (formerly CS6)	We fully support aspirations to promote mixed use commercial floorspace which fully accord with the aims and objectives of national planning guidance. Policy should be clear however that mixed use commercial floorspace includes retail development for the reasons set out above.	Mixed use commercial development can comprise a number of uses with or without retail.	None
3 7 9	2			Asda Stores Ltd	CS8 A strong and prosperous Barnet (formerly CS6)	We support policy aspirations to promote commercial investment in existing town centres. However, in terms of economic growth throughout the Borough it should be made clear that retail is considered an important form of economic development. Both PPS4 and its emerging replacement (draft PPS4) makes clear that retail should be considered an important form of economic development. Equally at Section 12 (Promoting a Strong and Prosperous Barnet) it is acknowledged that Barnet's economic growth is increasingly in service-orientated employment and high level knowledge-based jobs and the Council acknowledge that growing numbers of higher skilled workers are employed in various sectors, including retail. In line with this, it should be made clear within the vision for the borough as a whole that retail is integral to economic development and growth in Barnet.	Reference to business covers retail adequately. We have added a new section to reflect PPS4 and the definition of economic development. Retail is not the only form of economic development. PPS4 provides the following guidance in relation to when planning authorities are assessing retail need - "in deprived areas which lack access to a range of services and facilities, give additional weight to meeting these qualitative deficiencies. However, any benefits in respect of regeneration and employment should not be taken into account, although they may be material considerations in the site selection process." (EC1.4b). We have added a new section to reflect PPS4 and the definition of economic development. Retail is not the only form of economic development Therefore the employment generating capacity of retail schemes are not a consideration at a policy level.	Add definition of economic development at para 13.1.3

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

3 7 9	1 4			Asda Stores Ltd	CS8 A strong and prosperous Barnet (formerly CS6)	<p>The Council state at paragraph 12.1.2 that:          "Barnet's future economic growth is projected to be increasingly in service-orientated employment and high level knowledge based jobs with growing numbers of higher skilled workers in financial, retail, business and professional services."</p> <p>We welcome the inferred acknowledgement that retail represents an important form of economic development in the Borough. However, policy needs to make clear that the Council recognise retail as an important contributor to the economy and to confirm the importance of retail jobs.</p> <p>The Governments recognition of both industrial uses and retail as economic development in the new PPS4 (issued in May 2009) is the culmination of policy evolution that has sought to recognise the employment and economic merits of retail uses. Consequently, national guidance no longer differentiates between industrial uses or retail uses in seeking to stimulate job creation generally.</p> <p>The objectives in the most recent draft PPS4 stem from guidance previously set out on the importance of retail led regeneration (Underserved Markets: Retail and Regeneration, DCLG, October 2007). In this report the Government consider that the role of the private sector is vital in stimulating growth in disadvantaged neighbourhoods. Within this context they consider that "Brand retail can bring economic benefits to deprived communities including: improved access to quality, low cost products, increased employment and training opportunities".</p> <p>The guidance makes clear the importance of retail jobs as a catalyst for regeneration. Retail jobs are considered of significant value since many such jobs require lower initial skills or entry level qualifications, offer flexible hours and have a high demand for works. In this context they are considered to represent a 'stepping stone to wider opportunities'.</p> <p>Jobs provided by operators such as Asda are seen to offer career development opportunities and consequently the Government considers that retail development has an important role to play in local economies and regeneration. Policy needs to make clear that the Council will support retail development and welcome retail jobs. In line with national guidance retail should be considered a form of economic development and the importance of retail jobs recognised.</p> <p>This has added importance where retail proposals may come forward on land previously used for 'employment uses' i.e. B1, B2 and B8 uses. In such instances retail proposals should be assessed on their merits. Such proposals will in the majority of cases provide more jobs than previously generated and as such these proposals should not be prejudice on employment grounds because they are for retail uses.</p>		None
3 7 9	1 5			Asda Stores Ltd	CS8 A strong and prosperous Barnet (formerly CS6)	<p>It is noted that 61% of existing employment land is likely to require intervention to remain viable. In this context it is important that the Council's policy retains flexibility that allows all proposals on employment land to be assessed on their own merits.</p>	<p>Intervention could cover a range of solutions from improving vehicle access and parking provision to greater flexibility on use to encouraging the subdivision of existing units. Policy CS9 is clear that we meet the needs of modern businesses and encourages improvements to the quality of existing employment provision.</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 1 5	1			Urley Estates Ltd	CS8 A strong and prosperous Barnet (formerly CS6)	<p>We have the following general observations by way of representations on behalf of Urley Estates Ltd in respect of Barnet House, High Road, Whetstone, N20. Policy should recognise that sites in existing employment use have the potential for mixed use development, particularly where they are well located to the town centre and public transport infrastructure.</p> <p>Policy should also embrace sufficient flexibility according to the site specific context, whereby to ensure the overall financial viability of a development scheme a range of alternative uses for the site should be considered as acceptable in principle, which could include residential use.</p> <p>Employment Policy should also acknowledge the significant employment return from non-B class type activities, in both quantitative and qualitative terms, for example in the retail and leisure sector.</p>	<p>The Development Management Policies DPD will provide further detail on policy for existing employment sites. The Site Allocations DPD and where appropriate the emerging Town Centre Frameworks or planning briefs are the appropriate documents for site specific considerations.</p> <p>The Core Strategy supports mixed use developments in town centres that contributes to their vitality and viability.</p>	None
4 1 5	1			Urley Estates Ltd	CS8 A strong and prosperous Barnet (formerly CS6)	<p>We are grateful for your consideration and await publication of the Town Centre Framework Document for Whetstone and the LDF Site Allocations Document on which we will be submitting further representations.</p>	<p>We consider that Whetstone no longer merits specific identification as a priority centre. The appropriate way forward will be to adopt a planned approach, probably through a Planning Brief, to any future development opportunities in Whetstone and use the Development Management Policies DPD to consider such proposals</p>	None
4 2 9	5	Gaby	Kagan	Labour Group	CS8 A strong and prosperous Barnet (formerly CS6)	<p>We need to make full use of the Skills Development Group to set up the vocational training and apprenticeships for the skills that we will need to deliver the essential affordable housing and infrastructure. We should be doing whatever we can to provide local employment here in Barnet. We should have incentives to encourage small firms and businesses to establish themselves here.</p>	<p>This relates to S106 policy the priorities for which are clearly set out in the Core Strategy policy CS14 and includes training. We are producing SPD on Contributions to Enterprise, Employers and Training which will aim to ensure that residents have the opportunities to access skills training and new possibilities in Barnet.</p>	Revise LDS to introduce new SPD on Contributions to Enterprise, Employers and Training
4 3 3	5	Georgia	Wrighton	Women's Design Group	CS8 A strong and prosperous Barnet (formerly CS6)	<p>"to promote Barnet as a place of economic growth and prosperity": BWDG welcome this objective as women often juggle a variety of different demands on their time and close proximity to work and especially part-time and flexible working opportunities is often essential for them. Provision of a vibrant local centre and facilities could assist in this. However, this objective must also include the retention &amp; provision of sufficient local employment premises, and opportunities for flexible working including home working in the Borough. It should ensure the provision of flexible work spaces and recognise the importance of business support for start up &amp; small businesses.</p> <p>Female employment participation rates are much lower in London than elsewhere in the Country and current strategies for growth have failed to benefit women. Much more must be done to ensure that appropriate flexible and part time employment opportunities are championed in the Borough and in London generally.</p>	<p>We do recognise this issue and are preparing a SPD on Contributions and Enterprise Employment and Training which will help to ensure residents have the opportunities to access skills training and new employment provision in Barnet. This will also support the new provision of affordable workspace.</p>	Revise LDS to introduce new SPD on Contributions to Enterprise, Employers and Training

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 3 6	7	Robert	Newton	<p>CS8 A strong and prosperous Barnet (formerly CS6)</p>	<p>Reasons: Barnet has become a “dormitory” area and many employment sites have been redeveloped for housing or mixed housing/employment uses. This should be halted and reversed particularly given the need to provide opportunities to reduce journeys to work.</p> <p>Additionally, whilst there are many businesses conducted from home, there is minimal provision of affordable and flexible small business space needed to accommodate these businesses as they expand. A Section 106 fund and construction of small units as part of the planning gain contribution of larger schemes will contribute to meeting this need, which is unlikely to be met by the market without assistance and incentives.</p>	<p>This suggested approach will be considered in the Development Management Policies DPD and the principle set out in the first paragraph will not change. We recognise the benefits to the vitality and vibrancy of town centres as well as reducing the need to travel, from the provision of flexible workspaces for smaller businesses. We also recognise the benefits of equipping residents with the skills to access new jobs within Barnet. We do recognise this issue and are preparing a SPD on Contributions and Enterprise, Employment and Training which will help to ensure residents have the opportunities to access skills training and new employment provision in Barnet. This will also support the new provision of affordable workspace. We seek to protect sites with modern business uses that contribute to the prosperity of Barnet.</p>	<p>Revise LDS to introduce new SPD on Contributions to Enterprise, Employers and Training</p>
					<p>Additionally, diverting Section 106 funds to training and related initiatives has not always been the most efficient and productive use of these funds whereas contributions to “bricks and mortar” have an element of permanency and employment potential.</p> <p>Re-write first bullet point to read:          “Safeguarding existing business use sites so as to retain local employment opportunities that reduce the need to travel and to discourage the run down of employment sites in the hope of redeveloping for higher value uses such as housing. Encouraging development that improves the quality of existing employment provision and that increases provision generally.”          Under the third bullet point, after the word “hubs” add the words “and the Council’s Economic Prosperity SPD will require Section 106 contributions towards workspace provision.”          Under the sixth bullet point, add the word “meaningful and productive” between the words “deliver” and “employment”.          Amend the wording of Paragraphs 12.1.1 to 12.6.8 where necessary to reflect these changes to Policy CS6.</p>	<p>The Core Strategy needs to provide clear strategic direction, it is not subjective. Meaningful and productive is subject to a range of interpretation</p>	

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 4 1	9	Warren	Forsyth	Middlesex University	<p>CS8 A strong and prosperous Barnet (formerly CS6)</p> <p>The University particularly welcomes recognition of the importance of Further and Higher Education in 12.6 and the explicit references to Middlesex University's role in paragraph 12.6.1. The paragraph, as worded, implies that the University has completed its relocation and improvement strategy for the Hendon campus, whereas it is part of the way through it, and the Core Strategy should provide the policy basis for successfully completing it.</p> <p>We recognise that further details of Middlesex University's proposals for the Hendon Campus will be more appropriately dealt with in the Site Allocations DPD and any SPD or other site briefing documentation that may be produced and agreed with the Council.</p> <p>We suggest that the second sentence beginning "Middlesex University has relocated its main campus to Hendon..." is replaced by "Middlesex University is relocating its dispersed programmes from other sites to its main campus at Hendon, where new state-of-the-art teaching, learning resource centre and research facility</p> <p>We also suggest that under paragraph 12.6.8, Policy CS 6 – Promoting a strong and prosperous Barnet is slightly expanded to encourage the provision of enhanced further and higher education facilities. We have not found another part of any other policy that does this, although it is implied. The current reference to further and higher education in Policy CS 6 is in supporting businesses by encouraging partnership working with the FHE sector, which is laudable but insufficient.</p> <p>We suggest that there is a further addition to the policy, along the lines "We will support providers of further and higher education by:</p> <ul style="list-style-type: none"> <li>• encouraging the provision of new and improved facilities within the Borough;</li> <li>• encouraging the provision of further and higher education programmes, skills training and continuing professional development programmes, business support initiatives and applied research." </li></ul>	<p>In order to support the plans of Middlesex University over the next 15 years (the lifetime of the Core Strategy) we require further information on their strategy for the same period in order to help inform the Infrastructure Delivery Plan.</p>	Revise para 13.7.1
4 4 2	6			British Library	<p>CS8 A strong and prosperous Barnet (formerly CS6)</p> <p>The BL is supportive of the creation of a strong and prosperous community that provides opportunity for economic advancement. In accordance with draft PPS4 the BL also welcomes appropriate larger mixed use developments and commercial floorspace in larger centres which will be served by public transport as noted in point 2 of Policy CS6.</p>	<p>We welcome this support</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 4 3	6		<p>Metropolitan Police Authority</p> <p>CS8 A strong and prosperous Barnet (formerly CS6)</p>	<p>Chapter 12 highlights the borough's future strategy for employment land. The MPA are content in principle with the approach in Policy CS6 - Promoting a strong and prosperous Barnet, which promotes the protection of employment sites in the borough. However this is on the basis that policing facilities are considered acceptable on such land.</p> <p>The MPA have identified the potential of relevant employment sites in helping them meet goals of their estate strategy. In particular, the provision of patrol bases, custody centres and relevant pan-London policing facilities are vital to the successful implementation of the MPA's estate strategy. The nature of these uses is similar to that carried out on most employment sites and therefore is ideally suited to employment sites and similar locations.</p> <p>Whilst falling outside the 'B' use class definition, these policing uses are employment-generating uses. Generally the policing uses represent no material alteration from an Employment (B1) or Warehousing (B8) use as they possess an employment density similar to or in excess of 'B' Class uses. Vehicle movement will also be similar to a typical employment/industrial use. These facilities do not require continued public access and therefore have no requirement to be located in town centre areas.</p> <p>It is demonstrated above that the policy requirement to provide employment uses within designated existing employment sites can be met through the provision of appropriate policing facilities on such land. Mindful of this, policing uses can be appropriately located within existing employment sites.</p> <p>Furthermore, it is considered that a planning policy basis as suggested below to support appropriate policing facilities on employment sites in LB Barnet would not prejudice current or future employment land supply across the borough, as such uses are compatible with the requirement to provide employment opportunity. This is supported by a number of London Borough's which have approved policing facilities on employment/industrial land, including Enfield (Cambridge Business Park), Haringey (Quicksilver Place) and Greenwich (Warspite Road).</p> <p>This approach is supported by the strategic development plan within Policy 3B.4. Industrial Locations which states that policies in DPD's 'should develop local policies and criteria to manage industrial sites having regard to helping meet strategic and local requirements for...social infrastructure.' Furthermore, Policy 2.17 Strategic industrial locations of the Emerging London Plan defines interalia 'other industrial related activities' as being acceptable within Preferred Industrial Locations. It is clearly demonstrated above that particular policing uses are essentially industrial and that the emerging Core Strategy should therefore reflect this. It is also further demonstrated that certain policing uses will also fulfil the strategic requirement regarding the provision of social infrastructure.</p> <p>In order to comply with strategic policy in this regard the following alterations to Policy CS6 are recommended below.</p> <p>Recommendation: The MPA recommend that Policy CS6 be amended to allow for policing facilities on surplus employment land.</p> <ul style="list-style-type: none"> <li>- safeguarding existing employment sites that meet the needs of modern business and emergency service providers. Development that improves or maintains the quality of existing employment provision will be encouraged, including that for emergency service providers.</li> </ul>	<p>The Core Strategy clearly states how it supports business by protecting existing employment land. PPS4 recognises mixed use developments role in facilitating economic development however it also recommends that we should where necessary safeguard land from other uses to facilitate a broad range of that economic development. PPS4 retains the requirement for an assessment of land and the Employment Land Survey provides this to support policy CS6. We consider that Policy CS6 is responsive to the needs of modern business and therefore promotes economic development in line with PPS4. The Development Management Policies DPD will provide further detail on policy for existing employment sites in relation to mixed use. The Site Allocations DPD is the appropriate document for identifying new policing facilities. As noted the London Plan also supports other industrial related activities.</p>	None
-------------	---	--	---	--	--	------

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 5 1	3			HI (Brent Cross) Ltd	CS8 A strong and prosperous Barnet (formerly CS6)	That said, Policy CS6 - promoting a strong and prosperous Barnet - seeks to safeguard existing employment sites. However, neither the policy itself nor its justification provides a clear definition of "existing employment sites or employment uses". The policy should be clear that its definition is consistent with the Use Class (amendment) Order 2005, and clarify which uses are considered as employment (which we consider would include C1/D2 Hotel and leisure uses). As the policy is ambiguous, it is inappropriate and as such it does not meet the tests of soundness.	The Development Management Policies DPD will define existing employment sites/uses. Policy has been made clear in safeguarding employment land.	None
4 5 5	2 9	Mike	Dawson	Finchley Society	CS8 A strong and prosperous Barnet (formerly CS6)	We agree with most of the policies mentioned in Policy CS 6. We propose the following amendments (in bold): i. in order to support small to medium enterprises new employment provision will include a range of unit sizes and types and include affordable and flexible workspaces and home working hubs ii. encouraging new mixed use commercial floorspace on the edges of our larger town centres (Edgware, North Finchley, Finchley Church End, Chipping Barnet, New Barnet and Whetstone) where access to public transport is good	The policy makes no reference to promoting edge of centre locations. PPS4 sets out a clear sequential approach to town centre development. Policy CS1 has been revised to make it much clearer how it sets the spatial agenda and how the main place shaping policies sit within the Three Strands Approach. Through the Development Management policies we will establish town centre boundaries for major and district town centres. PPS4 makes clear that residential is not a main town centre use.	None
4 6 4	1 3	David	Howard	Federation of Residents Associations in Barnet (FORAB)	CS8 A strong and prosperous Barnet (formerly CS6)	Please provide opportunities for people to work locally and for local small business expansion by safeguarding employment land and premises. This again requires more work on joined up public transport and adequate parking facilities in the meantime. Barnet has one of the largest numbers of small businesses in London and needs good quality small offices, serviced offices and small commercial units with potential to join several together or move into larger premises as the business grows. Small industrial and commercial parks should be developed in different parts of the Borough to meet local needs	We recognise the benefits to the vitality and vibrancy of town centres as well as reducing the need to travel, from the provision of flexible workspaces for smaller businesses.	None
4 7 0	1 0			Government Office for London	CS8 A strong and prosperous Barnet (formerly CS6)	Policy CS6 (Promoting a strong and prosperous Barnet) would be improved through the inclusion of more detail on the proposed quantity, location and timing for business, commercial and employment development.	Agree	Revise CS 8 to show forecast growth of jobs and demand for business space
4 7 1	5	David	Howard	New Barnet Community Association	CS8 A strong and prosperous Barnet (formerly CS6)	Policy CS6 states that you will encourage new mixed use commercial floor space in New Barnet where access to public transport is good. At this time it is unclear as to what will be the outcome of the Town Centre Framework and therefore advocating a policy of promoting mixed use commercial floor space may preclude other options such as residential development. We therefore wish you to remove the reference to New Barnet from Policy CS6	Agree.	Revise CS8
4 8 3	2 2	Maria	Nash	Barnet Women's Design Group	CS8 A strong and prosperous Barnet (formerly CS6)	Anti ageism needs to come into this grouping. Elderly people should be encouraged to participate by fees being reduced in order that they can access these skills which at present they get excluded because of financial restraints as they are on low pensions or benefits. The elderly should be included in this.	We refer to our response at 418/14	None
4 8 7	1 9	Michael	Storey		CS8 A strong and prosperous Barnet (formerly CS6)	Again, it's an open door to every Tom, Dick and Tesco to flatten New Barnet and build bland supermarkets.	We refer to our previous response at 471/5 on New Barnet with respect to this specific policy on promoting a strong and prosperous Barnet.	None
4 8 8	2 6	Glen	Rollings	Greater London Authority	CS8 A strong and prosperous Barnet (formerly CS6)	Brent Cross/Cricklewood is identified within the London Plan and draft replacement London Plan as a strategic office location / location for employment growth.	Policy has been revised to add reference to the potential of Brent Cross as a business location	Revise CS8

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

	6	John	Dix		CS8 A strong and prosperous Barnet (formerly CS6)	Policy CS6 states that you will encourage new mixed-use commercial floorspace in New Barnet where access to public transport is good. At this time it is unclear as to what will be mixed use commercial floor space may preclude other options such as residential development. I therefore wish you to remove the reference to New Barnet from Policy CS6.	Agree	Revise CS8
	20	Steven	Deller		CS8 A strong and prosperous Barnet (formerly CS6)	Build in Cricklewood spend the S106 money everywhere else	Parts of Barnet where there are high levels of worklessness will benefit from support to access work.	None
P r o f o r m a				New Barnet	CS8 A strong and prosperous Barnet (formerly CS6)	Policy CS6 states that you will encourage new mixed use commercial floorspace in New Barnet where access to public transport is good. At this time it is unclear as to what will be the outcome of the Town Centre Framework and therefore advocating a policy of promoting mixed use commercial floor space may preclude other options such as residential development. Recommendation made to remove the reference to New Barnet from Policy CS6	Agree	Revise CS8
P e t i t i o n				Save our suburbs	CS8 A strong and prosperous Barnet (formerly CS6)	Provide opportunities for people to work locally and for small business expansion by safeguarding employment land and premises.	The Development Management DPD will define existing employment sites/uses. Policy has been made clear in safeguarding employment land.	None
2 4 2	1	Peter	Storey	Friern Village Residents Association	CS9 Providing effective and efficient travel (formerly CS 8)	The above policy whilst recognising the current problems of traffic congestion within and around the borough makes no mention of available alternatives to cars, buses and trains. With the increased proposed population the traffic problems can only get worse if alternatives are not explored. Getting around the area is central to quality of life in Barnet - if alternatives to cars and buses are not found then all in Barnet will suffer a reduction in their quality of life here. Throughout the developed world towns and cities are re-introducing tram systems as a way to beat traffic congestion. Barnet is ideally situated to begin a system which could eventually cover the whole of North London. The system should join existing transport hubs such as railway and tube stations and serve all town centres on an east/west basis.	Policy CS 9 sets out what key transport infrastructure is going to be provided to support growth. The infrastructure delivery plan sets out what, when, where and how it translates into delivery over the next 15 years including transport, community facilities and parks. Regarding tram systems please see response at 416/7	Publish Infrastructure Delivery Plan
2 4 2	2 7	Peter	Storey	Friern Village Residents Association	CS9 Providing effective and efficient travel (formerly CS 8)	Consideration must be given to facilitating a new tram system linking all town centres and major transport hubs. Private car use should be deterred when public transport is available. Future development must make provision primarily for new public transport to serve it. Car use should be discouraged. How has Barnet influenced behaviour to reduce the need to travel? There is nothing wrong with travelling as long as it is by excellent fast public transport including a new tram system.	For tram systems please see response at 416/7 There may be issues with travelling where any transport system does not have the capacity to meet the demand placed on it, and one way of tackling this is to reduce the need to travel. This is being addressed through mixed use developments and the development management process. Barnet supports the proposed upgrade to the Northern line and the Thameslink Enhancement Scheme which will help provide better public transport services on key existing routes. Extensive public transport improvements are planned as part of the Brent Cross Cricklewood regeneration scheme	None
2 4 2	3 1	Peter	Storey	Friern Village Residents Association	CS9 Providing effective and efficient travel (formerly CS 8)	No mention has been made of improving links to the Moorgate - Welwyn Garden City line which runs through the east of Barnet. This is an important link directly into the City and Kings Cross at weekends. Off street parking facilities are currently non-existent at New Southgate, Oakleigh Park and New Barnet.	The Borough is supportive of reviewing and improving the bus network to serve railway stations and encourage greater usage of trains and will work with TfL to achieve this. The Borough is not looking to create new car parking facilities at these stations. There are 2 car parks at New Barnet station located off the public highway.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

2 4 4	5	Peter	Hewitt		CS9 Providing effective and efficient travel (formerly CS 8)	Such reassuring noble sentiments could not be more inconsistent with Barnet Council Planning Departments record insofar as the highly controversial and hotly contested JCoSS faith school in Westbrook Crescent, New Barnet, is concerned. If ever there was a planning permission application that deserved to have been dismissed from the outset it was that of JCoSS which so blatantly flaunted much planning criteria and environmental regulation – especially where travel is concerned e.g. where is the mandatory 'Green Travel Plan' for the 1,500 students and staff? What will happen in a few years time when hundreds of cars and coaches daily converge on New Barnet's already intolerably congested roads from places as far afield as Golders Green, Hendon, Belsize Park, etc. all of which lie within the anticipated student/staff catchment area of the new school?	It is not the role of a Strategic Policy document to comment on individual Planning Applications. The expansion of the school went through the Planning process which included the submission and approval of a Transport Assessment and condition 18 which requires the submission of a School Travel Plan which will be reviewed each year.	None
						It is nonsensical to assume that students and staff will either walk or cycle to the school. And yet, S.14 of the LDF omits any reference whatever to the crucial issue of school catchment areas. No mention of any policy that would rigorously impose geographical limits on the radius within which students may be enrolled, if that is, the Borough genuinely wishes to properly and efficiently address the over-riding imperatives of reducing its 'carbon footprint' or the adverse environmental consequences of traffic-congested highways. Until S.14 is suitably amended to take account of such blatant examples as the [inexplicably condoned] JCoSSs departure from accepted 'green travel plan' policy I shall strenuously object, as I've no doubt many other concerned 'Save New Barnet Campaign' members will.	We recognise the impact of the School Run and the Core Strategy is taking a comprehensive approach to tackle this issue through more effective school travel plans and traffic management schemes outside schools.  The JCoSSs school travel plan is currently being drawn up, being a new school it was not possible to predict where pupils would come from until the places were offered. Although a Transport Assessment was produced the catchment area and admission criteria were unknown at the time	
4 0 4	6	Matth ew	Thomas	Bride Hall Holdings Ltd	CS9 Providing effective and efficient travel (formerly CS 8)	In determining the future transport provision across the Borough, Bride Hall support the approach advocated in draft policy CS8 in accommodating the use of the private car as well as enhancing public transport provision.	We welcome this support. This is an issue that can be addressed in more detail in the Town Centre Framework.	None
						The vitality and viability of any Town Centre (including Edgware) is largely dependent upon the number of people that they attract and the ease of travel to a centre forms a large component of how many people will visit. Access by a variety of means should therefore be incorporated to ensure all members of the surrounding communities can access the Centre. Appropriate road infrastructure, parking and public transport provision should therefore form part of a successful centre and in a suburban location such as Barnet a balance should be achieved between trips by all forms of transport.		
4 1 6	7	Jon	Cox	London Campaign for Better Transport	CS9 Providing effective and efficient travel (formerly CS 8)	The LDF planners must be prepared to consider orbital light-rail solutions for such an enormous amount of redevelopment. The Direction of Travel's document fails to even follow up the subject, even after being raised in consultation.	It would be for TFL as the London wide strategic transport authority to review and progress light rail and orbital schemes since they cross several London boroughs. There are currently no identified and financially viable schemes in the TFL Business Plan,  Our understanding is that the reason for this is due to insufficient demand to provide a convincing business case to warrant further consideration. At present any proposals for orbital and light rail schemes are purely aspirational.	None
						The borough has also acquiesced in the rejection of light-rail at Brent Cross, even though public representations were made at the time of the Development Framework consultation. It has more recently rejected similar submissions over the two AAPs.		
						The global reasons are that, firstly, London-wide planners have failed to acknowledge the once-in-a-lifetime opportunity to leverage planning gain/out of London's development areas, mixed with, secondly, Barnet's ideological passion to promote road transport.		

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

					<p>(Even the new „Brent Cross Thames link“ station will probably mean closing Cricklewood and possibly Hendon stations, such is the likely pressure from the London-to-Bedford and the London-to Sheffield railway lobbies, although any „High-Speed Two“ recommendation in the spring that has a Derby or Nottingham spur, may affect that. The Core Strategy is not fit for purpose, because new orbital transport possibilities in Bar-net have not been seriously considered, despite many representations. Note that says —considered“, because it is accepted that there can be no presumption that a new off-road light-rail line is financially viable. However, it is not an acceptable position for Barnet to claim that it is too late to study the subject.</p> <p>Hopefully the Brent Cross planning application will be called in, and the public will have the opportunity to cross-examine Barnet officers in excruciating detail about how they have handled the borough's development areas over the last ten years. In the meantime, the LDF must mention in detail the subject of light-rail and other orbital transport.</p>		
418	18	Julia	Hines	Age Concern	<p>CS9 Providing effective and efficient travel (formerly CS 8)</p> <p>We are concerned about the emphasis on reducing congestion and reliance on car travel.</p> <p>We support traffic calming measures and the provision of frequent safe crossing points, including pelican crossings, because older people often lack the confidence to cross roads with fast flowing traffic. We strongly disagree with policy CS8.</p> <p>In addition, car travel is a major factor in climate change, an issue which already does and will increasing, have a disproportionately detrimental effect on older people.</p> <p>Walking and cycling are both healthier options for all age groups, and their encouragement will promote better health in the next generation of older people. We do not think that cycle paths should be restricted to off road routes.</p>	<p>Barnet is looking to tackle congestion and at the same time support key improvements to public transport. Congestion is one of the most significant issues of concern to Barnet residents. Given that car travel will continue to be the dominant mode in outer London, and the fact that Barnet is a suburban location with diverse travel patterns that cannot be provided for by non car modes, then appropriate provision for car travel needs to be made. That is not to say that the borough does not have good public transport services and facilities, and in the Regeneration areas in particular there are significant improvements proposed, improving choice and reducing reliance on the car.</p> <p>The Council provides safe crossing facilities where they are deemed to be justified. and traffic calming measures are provided in appropriate circumstances. Road humps are reviewed as part of resurfacing schemes and only removed where evidence justifies this. The Council seeks to ensure that vehicles speeds are appropriate and not excessive, although enforcement is a Police matter. The link between traffic and poor air quality is recognised, and the Council is supportive of the use of low emission vehicles to address this. Electric vehicle charging points are now being incorporated into new developments.</p> <p>There is significant walking in Barnet (29% of all trips). Cycling is less common, due in part to the topography of the borough, although there are some good off-road routes, which are safer than on road facilities. It is difficult to provide cycle paths and lanes along the suburban road network in Barnet because of existing physical constraints, although there is a network of routes signed along quieter roads. Safe cycle routes are being planned as part of the Regeneration schemes and incorporated into new developments.</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

418	20	Julia	Hines	Age Concern	CS9 Providing effective and efficient travel (formerly CS 8)	We support the use of spatial planning to improve health and well-being, but see this as being at odds with the emphasis on car travel in CS8.	Please see response at 418/18 above. Barnet's suburban transport policy recognises that car travel is the dominant mode in this part of outer London and will continue to be in the future. New developments and borough Regeneration schemes seek to provide for all modes of travel.	None
429	6	Gaby	Kagan	Labour Group	CS9 Providing effective and efficient travel (formerly CS 8)	The LDF must have robust policies to encourage a shift to more sustainable modes of transport including public transport, cycling and walking. We should make more secure provision for cyclists and cycle parking. There are grants from TFL available which Barnet should avail itself of. We have not always taken full advantage of these monies in the past, to the detriment of current and prospective cyclists. We should encourage home working where it is appropriate. As the largest employer in the borough we should encourage staff that do not need to be in a Council office to work from home in this internet broadband age, while ensuring that they have proper corporate support.	The transport policy focus in the LDF is on ensuring more efficient use of the local road network, comprehensively tackling the school run, delivering high quality transport systems in the Regeneration areas and providing more environmentally friendly transport networks. This includes providing improved public transport in Regeneration areas, as well as supporting significant improvements to the Northern Line and Thameslink. More cycling and walking to school is being sought through the continued effective implementation of School Travel Plans, which include appropriate cycle parking facilities. A cycle praking space is provided for each new residential unit in Barnet. The Council does provide flexible working were appropriate and practical to the business.	None
						School Travel Plans and Green Travel Plans are often not worth the paper they are written on. They need to be taken altogether more seriously. They need to be enforced.	Our School Travel Plans have been successful in reducing the number of trips and we will ensure that they are more effectively implemented.	
						The School Run is a major cause of traffic congestion and pollution. Moreover health specialists warn that obesity in school children is now a national concern. Green Travel Plans that accompany planning applications are all too often there just to make the application more acceptable. It's crucial that they should be realistic, deliverable and fully supported. Too often they are just not enforced and sometimes not enforceable. We have good rail services for radial travel but not for orbital or east-west travel. Bearing in mind the large regeneration developments envisaged at Cricklewood/Brent Cross, Colindale, Mill Hill, Stonegrove and West Hendon may deliver up to 25,000 new homes and 21,000 new jobs we just have to consider the construction of east-west and orbital travel links. The London Campaign for Better Transport group is advocating the construction of an orbital light rail service for the Barnet/Brent area, mainly using existing railway corridors and old disused passenger train routes.	The School Run is recognised as an issue, and our Policy of taking a comprehensive approach to the school run is aimed at addressing this. The council secures travel plans via condition and sometimes via legal agreement as part of all relevant planning applications, and is looking to improve their enforceability. Travel plans within some of our regeneration schemes are crucial to their success, are robust and contain a comprehensive range of measures and provisions to ensure that they will be successful. The best example is at Brent Cross Cricklewood where the Framework Travel Plan contains target mode splits that need to be met as the phases of the development roll out.  On Light Rail - Please see response at 416/7	
433	6	Georgia	Wrighton	Women's Design Group	CS9 Providing effective and efficient travel (formerly CS 8)	-“to reduce the need to travel”; this objective is welcomed as it not only reduces the adverse environmental and health effects of congestion and pollution it also potentially opens up new ways of working with the requirement for facilities to be easily accessible- this is a principle supported and promoted by BWDG. However if the Council are serious about achieving this aim, the order of the bullet points should be reversed placing the measures to achieve reduced travel as the first bullet point. It should also include reference to how land use policies of location, design and mix will be strengthened to secure this objective. Secondly the bullet point addressing access to good and affordable transport should place more emphasis on walking, cycling and public transport, than the private car, which comes first in the proposed list of transport modes. Otherwise in practice the private car will continue to dominate as the mode of first choice, which will only exacerbate congestion, pollution and act as a barr	The order of the bullet points does not determine their preference. The policy has been revised to highlight the promotion of mixed use development on reducing the need to travel and the distribution of growth. Please see response at 429/6 regarding modes of transport other than the car.	Revise policy CS9

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

433	7	Georgia	Wrighton	Women's Design Group	CS9 Providing effective and efficient travel (formerly CS 8)	The provision of step free access tube stations in the Borough should be a priority for the Council, lobbying Transport for London and working with developers to secure this as necessary. A substantial level of growth is proposed at Colindale and a recent application for a new tube station did not include step free access. Not only will this put up barriers to women and disabled people to accessing this new station, but it will not help in terms of encouraging people out of their cars and onto public transport. Levels of congestion in Colindale are already critical.	Seven of the thirteen tube stations in Barnet are accessible and whilst the Borough supports the principle of step free access its provision would be a matter for the relevant station owner and / or operator, and would be subject to individual development negotiations. At Colindale a study into the feasibility and cost of providing step free access has been secured as part of the redevelopment of the former hospital site, and at Brent Cross part of the Regeneration scheme includes delivering step free access. The Council hopes that step free access will also be provided as part of the Mill Hill East regeneration scheme.	None
433	8	Georgia	Wrighton	Women's Design Group	CS9 Providing effective and efficient travel (formerly CS 8)	Public transport for new developments should be brought forward to the earliest opportunity and light rail/tram options should be considered wherever possible. There is concern that the level of development proposed at Brent Cross is not currently accompanied by acceptable proposals for new public transport provision.	Please see response at 416/7 for trams, and 242/1 for Infrastructure	None
433	9	Georgia	Wrighton	Women's Design Group	CS9 Providing effective and efficient travel (formerly CS 8)	Pedestrian and cycling routes should always be pleasant and convenient to use and should not play 'second fiddle' to the car as has been seen in some recent developments proposed. Off road cycle routes should be provided to encourage women to cycle- many women are put off by the dominance of the car on the Borough's streets and focussed measures need to be put in place to encourage feelings of safety when cycling. Many women give up cycling at a young age (when teenagers) and promotional activities need to recognise barriers to women and cycling. Only 30% of women have daytime access to a car and the inadequate provision of accessible public transport, walking and cycle routes will ensure that barriers to employment and participation in London life remain. Also, improvements to public transport, walking and cycling provision as we propose is essential if car travel is to be reduced in the Borough and pollution and congestion addressed. This is a key plank of environmental justice as it is often women and the poorer groups in society that are worst affected by pollution and poor environmental conditions.	Provision of transport and its infrastructure is aimed at all users, and safety is an integral part of the design process. Specific issues can be addressed as part of the development control and consultation process, although it should be noted that there are some good off-road cycle routes in Barnet.  The Core Strategy has been subject to an Equalities Impact Assessment	None
436	9	Robert	Newton		CS9 Providing effective and efficient travel (formerly CS 8)	Under the ninth bullet point insert a new sentence after the words "to travel by car." that reads "We acknowledge that in many CPZ areas there are more parking permits issued than parking spaces available and that new residential developments can exacerbate the situation. Arrangements will therefore be made for residents of new developments not to be eligible for on-street parking permits or contract parking provision in car parks managed by the Council and the Local Development Scheme will provide for the production of a Supplementary Planning Document to reinforce this policy."  Under bullet point 13, after the words "to be fully productive" add the words "and the Council's Economic Prosperity SPD will require Section 106 contributions towards workspace provision."  Amend the wording of Paragraphs 14.1.1 to 14.10.2 where necessary to reflect these changes to Policy CS8.  Reason: To inhibit overspill on street parking and to provide opportunities for local employment that reduces the need to travel.	The priorities for S106 are clearly set out in the Core Strategy  The Core Strategy supports a parking regime that balances reducing car use while recognising that many residents continue to travel by car. The DM policies DPD will provide more detail on car parking standards and policies for Barnet. The approach to the issuing of parking permits for new development reflects the strategy and that was agreed by Cabinet in 2004.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 3 9	6	Zenda	Green	Mill Hill Preservation Society	CS9 Providing effective and efficient travel (formerly CS 8)	Policy CS8- Providing integrated and efficient travel (P72) requires greater detail on promoting walking and cycling. Barnet is well endowed with green spaces, but greater investment is needed to maximise their potential for green travel. There is no map or plan to support these objectives. There should be greater detail on the improvements to public transport provision, particularly in the key areas of growth. For example to make Mill Hill East AAP work there will need to be more explicit commitment to investment at Mill Hill East Northern Line, beyond simply improving access.	In line with national planning policy guidance an infrastructure delivery plan will be produced which will provide detail on what infrastructure will be provided and where including open spaces and public transport. For regeneration areas information on walking and cycling proposals and schemes are published in the Brent Cross Cricklewood planning application or included in the relevant Area Action Plan.	Publish Infrastructure Delivery Plan
4 4 2	8			British Library	CS9 Providing effective and efficient travel (formerly CS 8)	The BL is supportive of integrated and efficient travel. The BL notes that Barnet is keen to see the concentration of growth in accessible locations where there are opportunities for redevelopment. The BL is therefore pleased to note that their earlier comments to the Core Strategy Issues and Options Paper have been taken on board and that the new public transport interchange has been recognised in the Core Strategy Direction of Travel Colindale Growth Area section (page 26 and 27). This transport interchange near the Colindale tube station will encourage multi-modal transport links and support a sustainable transport strategy, supporting higher density uses in accordance with PPS1 and PPS3 which notes that growth can be planned and directed to sustainable locations to minimise the need for new infrastructure. The BL is pleased to note that transport choice is a key part of Policy CS8. The BL is pleased to see the delivery of high quality transport provision especially improvements to rail services in the borough including upgrades to the Northern Line, Thames link and bus enhancements.  The BL site is located close to the Colindale Northern line station which contributes to the sustainable location of the site and as such the BL support the improvement to the existing tube station together with improvements to additional bus services.	We welcome this support	None
4 4 4	2	Cedric	Issac		CS9 Providing effective and efficient travel (formerly CS 8)	20 miles per hour on all residential areas, starting as a priority in Glendale Avenue.	Such a proposal is beyond the scope of the Core Strategy. Setting borough wide speed limits is more of an issue for the Transport LIP.	None
4 4 5	4	Joanne	Woodward	London Borough of Enfield	CS9 Providing effective and efficient travel (formerly CS 8)	Paragraph 14.3.1 – LB Enfield supports LB Barnet's comment that improvements are also required on strategic road networks, particularly the A406 (North Circular Road). This is consistent with LB Enfield's Core Strategy and we would like to explore opportunities for cross boundary consideration of transport improvements, particularly the road network.	We welcome this support. This can be explored as part of cross boundary working on the Infrastructure Delivery Plan and on Masterplans and Area Action Plans.	None
4 4 7	2	Emma	Ford	London Fire and Emergency Planning Authority	CS9 Providing effective and efficient travel (formerly CS 8)	The LFB request that Barnet conduct regular Traffic Management meetings with other partners and agencies during any regeneration schemes and whilst planning for any change to the road network. This is to ensure that access for emergency vehicles will not be compromised by future development to allow the LFB to continue to provide the highest class service possible throughout the borough.	This is a detailed highways issue and not one that can be addressed by the Core Strategy.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 5 5	4	Mike	Dawson	Finchley Society	CS9 Providing effective and efficient travel (formerly CS 8)	Barnet's Core Strategy should first examine resources in Barnet, where there are existing problems with infrastructure, then see where it is possible to create sustainable development and how to resolve existing problems. New flatted development in areas with a controlled parking zone should be denied a parking permit.	Key management corridors and congestion hotspot road junctions have and continue to be examined. Opportunities are and will be taken to address pinchpoints through providing improvements as part of development and regeneration schemes, such as at the M1 / A406 / A5 Staples Corner interchange planned to be improved as part of Brent Cross Cricklewood. Capacity is expected to be improved by TfL on the Northern Line and by Network Rail on the Thameslink route. Regarding the parking permit issue please see response at 436/9	None
4 5 5	1 1	Mike	Dawson	Finchley Society	CS9 Providing effective and efficient travel (formerly CS 8)	<p>Barnet Council acknowledges traffic blockages; particularly around the A.406 and that Town Centres are critical to the social, economic and environmental well-being of the borough. Yet they plan a huge increase in Brent Cross Shopping Centre, which will threaten the existence other Town Centres, which, "...are critical to the social, economic and environmental well-being of the borough...".</p> <p>A similar contradiction exists with traffic congestion. Barnet Council acknowledges traffic blockages, notably in the area where the majority of regeneration and new housing is planned (Brent Cross/Cricklewood and A.5 Corridor).</p> <p>Approximately 50% of working people travel to work by car. With extra non-work related car use, such as the school run, in such a congested area this is not sustainable development.</p> <p>'One emphasis is on the need to improve connectivity within outer-London, especially orbital routes. We do not see planning for this in the Core Strategy, other than 'seeking a network of 'express' bus services</p>	<p>The regeneration schemes are supported by Transport Assessments which demonstrate that adequate mitigation is proposed in order to enable the development to proceed. At Brent Cross Cricklewood a number of junction improvements along the A5 and A406 are included as part of the regeneration scheme.</p> <p>The School Run is recognised as an issue, and our Policy of taking a comprehensive approach to the school run is aimed at addressing this.</p> <p>In line with national planning policy guidance an infrastructure delivery plan will be produced which will provide detail on what infrastructure will be provided and where. It should be noted that there are a number of new and improved bus services proposed in the regeneration areas, including at Brent Cross Cricklewood where several orbital bus routes will be improved and others created.</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 5 5	1 2	Mike	Dawson	Finchley Society	CS9 Providing effective and efficient travel (formerly CS 8)	<p>Radial underground routes are already overloaded and the road network, particularly on orbital routes. A 16% increase in homes is expected by 2026. If dependency on car use is to reduce public transport must be dramatically improved to cater for both 16% increase in population plus those current car uses that are expected to switch to public/other modes of transport. We do not see the required increase in provision of public transport in DoT. The London element of the corridor is currently projected to deliver approximately 100,000 new jobs to 2026. With Brent Cross - Cricklewood this will bring huge increases in demand for both public transport and car use. Public transport and traffic are already congested, particularly traffic. DoT fails to show how these expected increases in congestion will be accommodated.</p>	<p>The current TfL Business Plan includes improvements which are expected to yield a 20% increase in capacity on the Northern Line in Barnet. The TfL Business Plan also contains an interim improvement scheme proposed for Henlys Corner, although in the longer term the council is seeking a major improvement at this junction, and at Golders Green Road. Other major improvements to the North Circular Road are proposed as part of the Brent Cross Cricklewood Regeneration scheme. Also, please see response at 456/2</p> <p>In line with national planning policy guidance an infrastructure delivery plan will be produced which will provide detail on what infrastructure will be provided and where.</p> <p>A detailed Transport Assessment has been produced as part of the Brent Cross Cricklewood regeneration scheme which includes an analysis of existing conditions as well as those predicted as a result of the phased delivery of the scheme, including appropriate levels of transport mitigation thus ensuring that scheme impacts can be accommodated by the transport system.</p>	Publish Infrastructure Delivery Plan
4 5 5	3 1	Mike	Dawson	Finchley Society	CS9 Providing effective and efficient travel (formerly CS 8)	<p>DoT accepts existing transport issues, both public and private and gives its transport priorities as:</p> <ul style="list-style-type: none"> <li>• reducing the need to travel;</li> <li>• promoting transport choice;</li> <li>• more environmentally friendly transport networks;</li> <li>• ensuring more efficient use of the local road network;</li> <li>• delivery of high quality transport provision</li> </ul> <p>As priorities they are fine. What is lacking in some of the priorities cited above and Policy CS 8, is the ability to materially change or improve the situation. Travel plans and 'managing' parking schemes will help, but the major traffic generation of Brent Cross can only increase significantly with the centre's expansion.</p> <p>Mill Hill East is a growth area designated for some 2,350 new homes. Roads from this area do not allow designated priority bus routes to be operated. All buses have to use the already congested roads resulting in the inability to significantly improve bus services. Northern Line trains have little spare capacity. Some future residents may well be employed within the growth areas</p>	<p>Please see response to 455/12.</p> <p>The transport analysis work undertaken as part of the development of the approved Mill Hill East Area Action Plan confirmed that 2,000 residential units could be accommodated on the site. The council is working with TfL and the developer for the site to plan for a number of bus routes to be diverted so they run through the area. Please see response to 455/12 regarding the Northern Line capacity.</p>	Publish Infrastructure Delivery Plan

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 5 6	1	Patrick	Blake	Highways Agency	CS9 Providing effective and efficient travel (formerly CS 8)	To manage housing growth to meet housing aspirations As stated in our response to the CS Issues and Options consultation, as part of a package of measures contributing to a reduction in the need to travel, it is recommended that the CS should seek to deliver a balanced provision of housing, employment and services. As such, the HA are supportive of measures which would seek to not only spread housing growth across the borough, but also seek to address any present imbalances. This would ensure that the needs of residents can be met locally and in turn limit the need to travel beyond Barnet on already congested sections of the SRN. This approach would help to reduce the need to travel, in line with the objectives of PPG13 and will help ensure that the CS is in line with national policy and hence sound by PPS12 (2008). The HA acknowledges that further detail on the boroughs approach to mixed use development will be set out in the Development Management DPD while specific sites identified for mixed use will be specified in the Site Allocations DPD. The HA look forward to being consulted join the two documents in due course.	The key development sites across Barnet are focused on the west of the borough, so there is an inevitable imbalance in terms of housing growth. The development sites form part of the London-Luton corridor, as acknowledged in recent pan-London Mayoral strategies. In addition, all regeneration schemes and associated major applications are carefully investigated, through the development of Area Action Plans and detailed transport assessments for example, to ensure that the impacts are mitigated against as far as possible. The emphasis is on ensuring that development is of mixed usage, thus helping to reduce the number and distance of associated trips by providing everyday service and facilities close to where people live.	None
4 5 6	2	Patrick	Blake	Highways Agency	CS9 Providing effective and efficient travel (formerly CS 8)	To reduce the need to travel - the HA notes that the above objective recognises the private car as an important means of travel. We would therefore like to reiterate our previous comments stating that the HA is particularly keen to ensure that LBB's CS will not result in a lengthening and greater number of car-based journeys on the SRN. This would directly contradict the principles in PPG13 and DfT Circular 02/2007 (Planning and the Strategic Road Network). In order to ensure that the document is in line with the PPS12 requirement for a sound CS to follow national policy, the HA would recommend that the 'reduce the need to travel' core objective is reworded thus: "To keep Barnet moving in a sustainable way, to provide choice and modal shift by encouraging and facilitating the use of convenient and reliable sustainable transport. To promote sustainable travel modes and reduce the need to travel, locating development in appropriate locations and promoting home working and new technologies."	The transport section of the LDF Core Strategy has been reviewed, and provides a detailed and strengthened commentary on how the Council is seeking to provide effective and efficient travel, as summarised in Policy CS9. However, given Barnet's location as an outer London borough, and the growth being planned for, it is inevitable that there will, to an extent, be an increase in traffic levels on the road network, as was acknowledged in the recent work of the Outer London Commission.	Revise CS9 and supporting text
4 5 6	3	Patrick	Blake	Highways Agency	CS9 Providing effective and efficient travel (formerly CS 8)	The HA remains concerned that the emphasis of the CS is focussed on car usage and does not have sufficient priority to encouraging sustainable modes of transport. Although travel by car is likely to remain an important modal choice within the Barnet area, it is important that an emphasis is placed on the provision and improvement of sustainable transport infrastructure and that these modes are considered first, particularly where high trip-generating developments such as offices and retail are proposed. In line with the DfT's Guidance on Transport Assessment (2007), this emphasis will assist in mitigating potential increases in private vehicle trips. As such sustainable travel measures should be prioritised for localised increases in road capacity. The implementation of costly road infrastructure schemes would not be in line with national policy and hence PPS12 (2008). The HA is pleased that the CS proposes to improve facilities for walking and cycling across the borough. In particular these should seek to integrate walking and cycling improvements with the sustainable transport network as a whole. This approach would help to promote the use of sustainable models in line with PPG13 and hence PPS12 (2008). Additionally the HA welcomes proposals which include improvements to public transport facilities that will increase the appeal of these sustainable travel options.	It is not clear what costly road infrastructure schemes are being referred to. The HA have been involved as a stakeholder in our major regeneration schemes, including at BXC, and party to both the modelling work that supports BXC and the outputs. Our position is that to prioritise other modes over car travel in a blanket way is unrealistic. We consider that a more balanced approach that considers each development on its own merits is more appropriate. Notwithstanding this, there are a range of improvements to all modes of transport proposed in the regeneration areas, including substantial public transport improvements at Brent Cross Cricklewood where there is a major regional shopping centre, and nearby at Wembley a national events venue, and the shopping centre in particular needs to be provided with appropriate transport infrastructure across all modes, including as part of a balanced package of transport measures a new and improved M1 junction 1.	Revise CS9 and supporting text

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 5 6	4	Patrick	Blake	Highways Agency	CS9 Providing effective and efficient travel (formerly CS 8)	<p>The HA is pleased that the policy CS8 highlights the need for developers to submit travel plans as part of the planning applications process for significant trip generating developments. Travel plans should include measurable targets and a monitoring strategy to ensure that the objectives of the plan are undertaken effectively once the development is operational. In addition to the requirement of a Transport Assessment for such developments, in line with the DfT's Guidance on Transport Assessment (2007). This will ensure that the CS fully aligns with national policy and hence PPS12 (2008). The HA is also pleased that the Policy CS8 gives consideration to the implementation of car sharing schemes for new developments. These schemes should be included in a Travel Plan as part of the planning application process. It is noted that Policy CS8 proposes to manage a parking regime which recognises that many of Barnet's residents will continue to travel by car.</p> <p>As previously stated the HA recommends that maximum parking standards are reduced in areas with good access to public transport, and should not exceed those set out in Annex 4 of the London Plan. This would be consistent with the recommendations of PP13 and would help to ensure that the strategy is in line with PPS12 (2008).</p>	The Development Management DPD will provide further policy on parking standards and travel impacts.	Add footnote on Transport Assessment
4 5 6	5	Patrick	Blake	Highways Agency	CS9 Providing effective and efficient travel (formerly CS 8)	<p>Given the increased emphasis on evidence-based plans in PPS12, it is considered that a CS without an evidence base would not be justified and hence could be unsound based on criteria in PPS12. A recent guidance note by the Planning Inspectorate entitled "Examining Development Plan Documents: Learning from Experience (September 2009)" suggests that the most helpful approach is for evidence bases to be clearly signposted throughout the DPD text, for example, by the use of footnotes. The HA therefore recommends that an evaluation of transport impacts of the local and wider road network is clearly referenced by the borough to demonstrate that the CS is deliverable in transport terms.</p>	These comments are noted, and there are references throughout the transport section to supporting data. There has also been extensive work carried out in connection with each growth and development area to support the relevant policy framework, as well as detailed work undertaken in support of each planning application through the transport assessments and travel plans. The LDF process is also being informed by the ongoing work of Transport for London on the Sub-Regional Transport Study, which, is looking at the cumulative impact of growth across the North London sub-region up to 2031	None
4 5 8	3	Fiona	Henderson		CS9 Providing effective and efficient travel (formerly CS 8)	<p>I realise that the details of the core strategy are yet to be finalised. However, from notes I made on the LDF consultation paper, I would like to highlight the following;</p> <p>In relation to the London Plan (to which this document must comply);</p> <ul style="list-style-type: none"> <li>• 'There are policies relating to the reduction of traffic with a specific aim of reducing growth in outer London by a third and zero growth in town centres by 2001-2011. (p3; 2.1.9)</li> </ul> <p>Any development that relies on intensive car-use (such as a supermarket), in any town centre, will have a negative impact on traffic. This does not, in turn, fulfil the objectives of the UDP 'to enhance the quality of the natural and built environment.....to sustain local communities' (p8; 2.13), nor is it in line with the aim of the London Plan to make London a healthier place to live in.</p> <p>Finally, I would like to add that all this is against the background of the questionable designation of New Barnet as a bona fide 'town centre' in the first place, but this is dealt with in the standard letter I have already sent in. Please consider these comments as additional to rather than separate from this letter.</p>	<p>The target for limiting traffic growth set in the current London Plan relate to the period 2001-2011 so is of limited relevance to the LDF core strategy. The draft replacement London Plan sets a target of Zero traffic growth in central and inner London, and traffic growth in outer London reduced to no more than 5 per cent. Policies in the core strategy related to tackling the school run, delivery of high quality transport systems in regeneration areas and more environmentally friendly transport networks will all contribute to this.</p> <p>Any development with a large scale transport impact will have to be supported by a Transport Assessment and Travel Plan to demonstrate compliance with policy, and to demonstrate that adequate mitigation is proposed prior to consent being given.</p> <p>We refer to our earlier response about New Barnet's designation as a district town centre. It is not a new designation.</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 6 4	1 5	David	Howard	Federation of Residents Associations in Barnet (FORAB)	CS9 Providing effective and efficient travel (formerly CS 8)	Barnet's roads will not be able to cope with the projected increase in the number of cars at the present rate of ownership per household. There is a presumption of mode shift to public transport but no evidence of where the investment in public transport is coming from. Without improvements the shift will not take place and Barnet will cease to be an attractive place to live especially with the preponderance of poor quality one and two bed units.	Infrastructure provision is a key part of our policy on effective and efficient travel. In line with national planning policy guidance an infrastructure delivery plan will be produced which will provide detail on what infrastructure will be provided and where. There are extensive proposals for both road and public transport improvements in Barnet that will help accommodate growth and continue to make the borough a successful place where people want to live and work.	Publish Infrastructure Delivery Plan
4 6 4	1 6	David	Howard	Federation of Residents Associations in Barnet (FORAB)	CS9 Providing effective and efficient travel (formerly CS 8)	There are no plans to upgrade the mainline railways and the Bedford line in the west of the Borough is getting worse not better. TFL expressed concern at the Issues and Options stage about the need to phase growth to match improvements as the present transport infrastructure would not be able to cope. At the Colindale AAP enquiry TFL officers said there are no proposals for further investment in the Northern Line after the present works are complete.	The Mayors Transport Strategy contains information on which mainline railways are being upgraded. MTS includes Phase 2: Northern line Upgrade 2 to deliver a further 20 per cent increase in capacity through the simplification and recasting of service patterns as a funded proposal for delivery in the period 2013-2020	None
4 6 4	1 7	David	Howard	Federation of Residents Associations in Barnet (FORAB)	CS9 Providing effective and efficient travel (formerly CS 8)	Both Colindale and the Mill Hill AAPs assumed buses taking up the new demand. Buses will be using the already overloaded and at peak times now gridlocked roads. With more traffic the periods of gridlock will increase. East West public transport is infrequent, tortuous and totally inadequate actively encouraging car usage	Transport Assessments have been carried out for the three major growth areas in the borough, two of which have been adopted as Area Action Plans. The AAPs included proposals to improve road junctions. TfL bus services are regularly reviewed and are considered adequate, and any gaps can be addressed as part of the network review. The Borough is supportive of reviewing and improving the bus network to encourage greater usage and will work with TfL to achieve this. Notwithstanding this, the 3 main existing east-west corridors across the borough – Totteridge Lane, Barnet Road/ Wood Street and Dollis Road are already well served by buses	None
4 6 7	2 9	Pauline	McKinnell	Cricklewood Community Forum	CS9 Providing effective and efficient travel (formerly CS 8)	Should plan for less residents travelling by car.	Please see responses above, particularly 429/6	None
4 6 7	3 2	Pauline	McKinnell	Cricklewood Community Forum	CS9 Providing effective and efficient travel (formerly CS 8)	Agree to some of these but don't want a new station at Staples Corner because this will detract from Cricklewood Station. Also don't want a bus that only stops at some stops e.g.. Rapid transit service.	An infrastructure delivery plan setting out the where, when, what and how of infrastructure delivery will accompany the publication version of the Core Strategy. The location of bus stops and the services using them are a matter of detailed design, although a comprehensive range of bus service improvements are proposed at Brent Cross Cricklewood. The proposed new station on the Midland Mainline at Brent Cross will be designed to be compatible with the new 12 car trains being introduced as part of the Thameslink upgrade. The new station is being designed to work alongside the existing station at Cricklewood, which is also being invested in as part of the Regeneration scheme. Local stopping trains will continue to call at Cricklewood station, with the new longer fast trains stopping at Brent Cross	Publish Infrastructure Delivery Plan

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

470	12			Government Office for London	CS9 Providing effective and efficient travel (formerly CS 8)	Policy CS8 (Transport) identifies key transport infrastructure proposals. The Core Strategy or the Infrastructure Delivery Plan will need to demonstrate that any key infrastructure requirements are deliverable. Highlights of and appropriate references to Barnet's Infrastructure Delivery Plan should be brought into key areas of the Core Strategy.	Agree	Revise CS9 and publish Infrastructure Delivery Plan
471	17	David	Howard	New Barnet Community Association	CS9 Providing effective and efficient travel (formerly CS 8)	4.10.1 Makes the point that orbital transport is poor therefore car usage is inevitable. Why therefore is growth still being promoted before the transport issues have been addressed? Why no consideration of a rapid transit or light railway network to link the growth areas with existing underground and main line railways across the borough? There is no joined up thinking just an obsession with more housing flats, less desirable areas and gridlock.	Infrastructure provision is a key part of our policy on effective and efficient travel. Transport Assessments for developments and regeneration schemes ensure that the transport issues associated with the proposed growth are fully addressed. We highlight that TFL is a key partner in delivering infrastructure. Please see response at 416/7 on light rail scheme	None
477	27	Andrew	Newby	Barnet Green Party	CS9 Providing effective and efficient travel (formerly CS 8)	The parking regime should actively discourage people from travelling by car where public transport alternatives are satisfactory, e.g. Brent Cross	The Core Strategy supports a parking regime that balances reducing car use while recognising that many residents continue to travel by car. At Brent Cross Cricklewood the Framework Travel Plan sets out target mode splits, and the parking regime will need to be managed to ensure these are met. Please also see responses at 429/6 and 456/2	None
477	30	Andrew	Newby	Barnet Green Party	CS9 Providing effective and efficient travel (formerly CS 8)	Scrapping of clause (h). Instead of increasing road capacity a congestion charge should be introduced in any bottleneck areas. New clause: development of a direct light rail link to Brent Cross shopping mall, at the developer's expense	Please see response at 416/7 on light rail scheme	None
478	26	Steven	Deller		CS9 Providing effective and efficient travel (formerly CS 8)	Transport partners say they have no money for this	An infrastructure delivery plan setting out the where, when, what and how of infrastructure delivery will accompany the publication version of the Core Strategy.	Publish Infrastructure Delivery Plan
483	27	Maria	Nash	Barnet Women's Design Group	CS9 Providing effective and efficient travel (formerly CS 8)	Double Taxi Card swipes for disabled people Capital Cabs in Barnet Freedom Pass retained for all Regular West - East & East - West bus network Disabled parking bays which have hatching on either side to be available for wheelchair user's at all public places. Include making all pavements accessible for wheelchairs by having dropped curbs at each corner and enforce fines or towing away vehicles that park across dropped curbs.	These are specific transport issues that should be addressed by the review of the Transport Local Implementation Plan.	None
483	29	Maria	Nash	Barnet Women's Design Group	CS9 Providing effective and efficient travel (formerly CS 8)	Ensure that all people with different physical, sensory and neurodiverse conditions are consulted on all this	As part of our extensive engagement on the LDF we seek to ensure that representative groups such as Disabled Action Barnet and the Barnet Mental Health Network have the opportunity to participate in the process on behalf of people with such conditions.	None
483	30	Maria	Nash	Barnet Women's Design Group	CS9 Providing effective and efficient travel (formerly CS 8)	This should be rolled out to all areas not only new developments	It is through new development that the planning system can make this change happen.	None
483	31	Maria	Nash	Barnet Women's Design Group	CS9 Providing effective and efficient travel (formerly CS 8)	Create support groups to assist 'working from home' self employed people to prevent isolation and depression	Self employed people are capable of forming their own support groups without the Council's help.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

483	32	Maria	Nash	Barnet Women's Design Group	CS9 Providing effective and efficient travel (formerly CS 8)	All transport at tube and train stations and bus stops need to be step free and accessible to wheelchair users All pavements to have dropped curbs at all corners Accessible transport of buses across Barnet from West - East and East - West not only North - South or South - North Make all shops wheelchair accessible everywhere in Barnet to enable wheelchair users and other physically impaired people to shop locally and not have to travel to do their shopping	For step free access please see response at 433/7. All buses serving Barnet (including east-west) are fully accessible, and any new bus stops must be compliant with the latest accessibility standards. The Council can only influence accessibility through the development control process, not retrospectively impose current standards on existing businesses.	None
483	49	Maria	Nash	Barnet Women's Design Group	CS9 Providing effective and efficient travel (formerly CS 8)	Transport in the past and at present is pathetic in Barnet Local people should have a voice and not only council officers or elected members Disabled people with all types of impairments are not being included in your consultations Nor are young people who's future we are planning have enough input	Engagement with young people and disabled people by the Planning Service is an issue best addressed by the review of the Statement of Community Involvement.	None
487	25	Michael	Storey		CS9 Providing effective and efficient travel (formerly CS 8)	Stop school runs - run door-to-door school buses instead.	We emphasise that tackling the school run through the use of School Travel Plans in changing travel behaviour and reducing the number of car trips is one of the key elements of delivering integrated and efficient travel in Barnet..	None
487	28	Michael	Storey		CS9 Providing effective and efficient travel (formerly CS 8)	I don't want you to turn the A110 (Cat Hill) from a residential road into a busy cross-borough road. I don't want you to ruin New Barnet.	Major thoroughfares are no longer promoted as opportunities for infill development The A110 is a key part of the strategic road network (SRN) in Barnet and is therefore of strategic significance and so is expected to accommodate through traffic	Revise Key Diagram
488	6	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	The Core Strategy states that Barnet has high car ownership; TFL asks that this to be set out as a percentage, and similarly, a percentage for public transport use should also be included.	Car ownership within Barnet is relatively high, with 73.3% of households having access to a car.	Section 4.10 has been amended accordingly.
						The Core Strategy refers to orbital routes being less well served by public transport thus there is a reliance on private transport. This is accepted although there is no evidence to suggest high demand for such trips; TFL is currently looking at such trends as part of the North London Model and Transport Study.	Even if demand is low it is still a contributing factor to there being a reliance on the private car. We are working with TFL on the North London Modal and Transport Study but acknowledge the point, and there is less emphasis on orbital travel in the revised CS9.	
488	7	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	Paragraph 4.10.2 states that 39% in the borough and 42% outside the borough drive to work. A further 66% drive into the borough. It is unclear what the evidence base is for these figures. TFL requires an evidence base to support these figures.	The evidence base is the 2001 census.	None
						TFL would also encourage the Borough to have an aspiration to reverse these trends in favour of public transport and mode shift in line with the Draft Transport Strategy (5.22.2) to deliver a mode shift to public transport.	The council is working towards a mode shift to public transport, in the regeneration areas and through the processing of major planning applications. Barnet supports the current upgrade of the Northern Line and the Thameslink improvements.	
488	9	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	Bullet point 4, under section 6.2.1 states that "to keep Barnet moving in a sustainable way which provides choice by encouraging the use of convenient, reliable and affordable transport including the private car". Reducing the need to travel and encouraging sustainable travel should not include promotion of the private car; emphasis should be put on walking and cycling and the availability of facilities such as work closer to home.	Please see above responses, particularly 429/6	Revise supporting text to CS9
						In addition, bullet point 6 should recognise walking and cycling as a way of promoting healthy living.	Walking and cycling are widely acknowledged to improve health, but this does not need to be highlighted in this section. Reference is made in the Core Strategy section on Improving Health and Well Being	

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

488	10	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	Under the Ambitions: 'Keep Barnet moving', 'Clean and green' and 'Improving health and well-being' the Core Strategy Objectives should all include the promotion of public transport, walking and cycling in order to promote sustainable and healthy modes of transport.	More walking, cycling and public transport use is being planned for. Please see above responses, particularly 429/6	None
488	32	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	TFL would like to see the inclusion of additional text under Policy CS.4 – Promoting Barnet's town centres, to state that the council will "ensure high quality public transport, walking and cycling links and sufficient capacity recognising the needs of all users".	Policy CS6 refers to seeking improvements to the public transport network and pedestrian/cycling accessibility. This is a borough wide aspiration and not just for town centres. The council is seeking to improve transport capacity in our town centres, where feasible and practicable.	None
488	33	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	TFL considers that the Core Strategy has omitted a policy pertaining to integrated and efficient travel. TFL recommends there is text on assessing the impact of development through transport assessments, travel plans, cumulative impact of development, the need for s106 contributions and mitigation of transport impacts as the result of new developments in accordance with London Plan policies 3C.1 Integrating transport and development, 3C.2 Matching development to transport capacity and policy 6.3 Assessing transport in the Consolidated draft replacement London Plan (October 2009).	Effective and efficient travel is covered throughout section 14, and the text has been updated to incorporate TFL's representation	Revise supporting text to CS9
488	34	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	Paragraph 14.2.1 states that the car will remain the dominant transport mode in outer London. It should be noted that this is inconsistent with the percentage of work based journeys in the borough and the need to encourage mode shift to public transport, walking and cycling (see also London Travel Report). It is accepted that many parts of the network are congested; however this should remain at current levels or in some cases may reduce. TFL would like to see this section changed in order to take into account the most up to date research.	The car is recognised as being a dominant mode of transport in the Mayor's transport strategy and the work of the Outer London Commission. Growth in Barnet's regeneration areas is being carefully planned, in conjunction with TfL, to help ensure that congestion does not deteriorate.	Revise supporting text to CS9
488	35	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	Paragraph 14.3.1 refers to a priority to invest in orbital east-west links –TFL would like clarification on whose priority this is. 'Anticipated increases in traffic will require investment for access improvements and, as such, TFL recommends that the text should state that "developer contributions and government funding will be a priority". In this section, there is also a reference to the requirement for strategic road network improvements, in particular to the A406 (TLRN). It should be noted that the TFL Business Plan (2009/10-2017/18) sets out that at Bounds Green works are "scheduled for completion in May 2012; this project involves a number of safety and environmental improvements along the A406 Telford Road, Bowes Road and North Circular Road between Bounds Green Road, Station Road and Chequers Way. A two-lane dual carriageway will be created, pedestrian crossing facilities improved and a dedicated cycleway provided". Anything in addition to this is not currently funded.	This paragraph has been replaced, and references to investment in orbital links have been removed from the text. We also highlight that securing all possible external funding is and will be a priority. We also clearly state that the improvements outside of Brent Cross - Cricklewood will happen after 2018.	None
488	36	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	Paragraph 14.3.2 sets out that investment is being pursued for A41 (TLRN). It should be noted that there is currently no funding set out for A41 improvements in the TFL Business Plan (2009/10-2017/18). Any proposed improvements to the A41 will require justification through the 'Infrastructure Delivery Plan'. It is accepted that significant assessment work has been undertaken to review the growth areas of Mill Hill East, Colindale and Brent Cross Cricklewood which may impact on the road network.	This paragraph has been replaced, please see also 488/35	Revise supporting text to CS9

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

488	37	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	TFL welcomes the reference to cycle parking standards and electric vehicle charging points. In addition, TFL would like to see a reference made to the 'Cycle Superhighways' which will benefit the Borough via routes 11 and 12. Paragraph 14.3.3 refers to the London Plan "parking regime" which will be introduced. This reference should reflect the published draft "parking standards" in Table 6.1 and the "cycle parking standards" in Table 6.2 of the Consolidated draft replacement London Plan (October 2009).	Noted. References to the revised draft parking standards have been updated. Barnet is keeping a watching brief on the new Cycle Superhighways before deciding whether to support them.	Revise supporting text to CS9
488	38	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	TFL would like to see the inclusion of additional text under paragraph 14.3.4 to state "car free, reduced car parking ratios and car clubs will be considered in locations with good public transport accessibility, for example town centres and strategic growth areas".	No addition is considered necessary as these are implicit in the flexibility of car parking standards	None
488	39	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	Paragraph 14.5.1 discusses a realistic approach to infrastructure investment based on sound evidence. TFL would like to see the evidence base cross referenced within the document. However, it believes the opposite is true: that town centres and growth areas have high accessibility.	The document has been revised to highlight the use of an evidence base including the Infrastructure Delivery Plan. Further evidence is being provided through TFL's North London sub-regional Transport Study.	Revise supporting text to CS9 Publish Infrastructure Delivery Plan
488	40	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	TFL would like to see the inclusion of an additional bullet point under paragraph 14.5.3 to include the transport priorities for "reducing the need to own and travel by car".	As a suburban location , where it is acknowledged car travel will continue to dominate, reducing car ownership is not a priority that is supported locally, as the ability to move around by non-car modes is limited. Car travel is being addressed through mixed use development and parking policy, particularly in the regeneration areas. Travel plans as part of new developments will also contribute by the provision of electric vehicle charging points and car clubs	None
488	41	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	TFL would like to see the "emerging evidence base" cross referenced within the document at paragraph 14.5.4.	The document has been revised to highlight the use of an evidence base including the Infrastructure Delivery Plan. Further evidence is being provided through TFL's North London sub-regional Transport Study.	Revise CS9 supporting text Publish Infrastructure Delivery Plan
488	42	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	At paragraph 14.6.2, a balance is required in the promotion of e-infrastructure, recognising that the promotion of online retail can also affect economic viability, in particular of local services, and this should be set out.  Public transport is provided on a regular level of service and it is more difficult for it to react to informal travel patterns. In addition, increases in delivery vehicles as a result of the promotion of e-commerce should also be accounted for in the transport assessment of new developments.	In the absence of robust evidence on impact of e-infrastructure and its impact on town centres and flexible working this section has been revised. Delivery and servicing are matters to be considered as part of the development management process.	Revise CS9 supporting text
488	43	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	TFL welcomes improvements to walking and cycling route set out in paragraph 14.7.1, however, on the main routes these should remain on the carriageway as they are more convenient and provide the quicker journeys (e.g. Cycle Superhighways).	The quickest routes for cyclists are generally along the main roads in Barnet, which will not be appropriate for some cyclists and therefore the Barnet cycle network includes off-road routes and those along quiet road links. See response 488/37 regarding Cycle Superhighways	Revise CS9 supporting text
488	44	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	TFL welcomes reference to safety of the transport network set out in paragraph 14.7.3.	We welcome this support. The relevant section has been updated and strengthened	Revise CS9 supporting text

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

488	45	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	TFL welcomes reference to electric vehicles set out in paragraph 14.8.1.	We welcome this support	None
488	46	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	Paragraph 14.10.1 refers to the station improvements that Barnet would like to see at Mill Hill East, Colindale, and Brent Cross - Cricklewood stations to accompany the planned increases in density at these locations. TFL supports this comment, however, would like to see further reference to the impact on congestion on the Northern line as well as at the stations. The Northern line is not crowded whilst it is in the borough of Barnet, but the impacts of new developments may lead to further congestion on the section of line though central London.	We recognise that congestion on the Northern line increases towards central London, hence the tube upgrades being delivered by TfL. It should be noted that impacts on the Northern Line have been modelled and included in the BXC Transport Assessment, prepared in full consultation with TfL. Station capacity has also been examined as part of the work on the Colindale AAP	Revise CS9 supporting text
						To mitigate against the future congestion forecast on the Northern line, London Underground is upgrading the signalling, allowing an increase from 20/22 trains per hour (tph) to 24tph on the High Barnet and Edgware branches. There are further plans for partial separation of the Northern line (with Bank branch trains terminating at Morden and Charing Cross branch trains terminating at Kennington, and with Edgware and High Barnet trains serving both Bank and Charing Cross	Barnet is opposed to any future downgrading and splitting of the Northern Line	
						TFL suggest that Barnet support for the Northern line upgrade and partial separation is included in the Core Strategy and that where developments are proposed that will have a large impact on demand for Northern line services through central London, developer contributions are sought towards the cost of partial separation. This is particularly true for developments from which residents are likely to commute, given that 58% of people working outside Barnet travel by public transport.	The Borough does not support the concept of developer contributions for the improvements TfL are progressing. The council's priority is to secure an efficient transport network in Barnet, such as step-free access schemes at the stations, and not to risk development viability by requesting contributions that we believe should be funded through the TfL Business Planning process	
488	47	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	TFL feels the wording of paragraph 14.11.1 should be reconsidered. The wording of the paragraph suggests that Barnet could not consider options that discourage the use of the private car without also aiming to discourage walking and cycling. This is inconsistent with the Mayor's Transport Strategy which seeks to 'Deliver a mode shift to public transport, cycling or walking instead of car use', and a further mode shift to walking and cycling instead of public transport use (Draft Mayor's Transport Strategy, section 5.22.2). It is generally noted that Barnet could adopt a more progressive stance towards discouraging the use of the private car than is adopted in the Core Strategy, as has been suggested in the Core Strategies of other London boroughs (including those in outer London). An increased focus on the importance of public transport provision in Barnet (as opposed to the private car) would provide a stronger steer in planning decisions towards improving Barnet's public transport in the future (including London Underground).	This option was discounted as part of the Direction of Travel  The Council does not consider that the use of the private car should be discouraged, rather that people should be free to make their own travel choices. In the Regeneration areas there are proposals to improve all modes of transport.	None
488	48	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	The core strategy refers to a review of bus services in the borough at Policy CS.8 and paragraph 14.4.1, TFL feels it important that it is recognised this would be done in partnership with TfL. The text "working with Transport for London" should be added here.	The supporting text for CS9 has been amended accordingly	Revise CS9 and supporting text
						It should be noted though that London Buses carries out a review of the bus network in London every five years, through a series of 'tranches' of routes loosely focused around specific areas, in consultation with boroughs, which enable evaluation of service changes in the context of the wider local network to take place, and therefore TfL cannot justify additional review.	We hope that TfL will change its stance and be prepared to take a more flexible and pragmatic approach in the future. As above the text has been re-worded to this effect	
						Similarly under express services, the text 'working with Transport for London' should be added	We are no longer seeking a network of express bus services	

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

488	49	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	TFL wishes to see the addition of the following points under Policy CS.8 in promoting integrated and efficient travel within the borough: • step free access and the promotion of public transport provision that is accessible	Incorporated into CS 9 under Delivery of high quality transport system in regeneration areas	Revise CS9
					• work with employers and developers to promote workplace and residential travel plans	Travel plans are produced as part of the transportation development control process, and some particularly progressive travel plans are being developed and implemented at Brent Cross Cricklewood and as part of the expansion of the Middlesex University Hendon campus.		
					• use of car clubs and car free development	See response to 488/38.		
					• a new bus station at Brent Cross and step free access at Underground stations e.g. Mill Hill East, Colindale and Brent Cross	New BXC bus station incorporated into CS 9. For step free access please see 433/7.		
488	50	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	The initiatives outlined in Policy CS.8 associated with behaviour change initiatives and smarter choices should be supported by a specific SPD on Travel Plans and Smarter Travel initiatives at a later date.	Notwithstanding the travel planning work associated with new developments the Council is not supportive of a Smarter Travel Initiatives SPD as it believes that people should be left to make up their own minds in terms of travel choices	None
488	62	Glen	Rollings	Greater London Authority	CS9 Providing effective and efficient travel (formerly CS 8)	TFL would welcome a reference to coach facilities or taxi set down and pick up in the Core Strategy. Provisions for coaches and taxis at developments such as hotels, schools, tourist attractions and leisure venues are key to their operational success. In addition to tourist/private hire coaches the importance of scheduled coach services, providing direct national and airport links from the Golders Green and Brent Cross areas, needs to be recognised. Ticket purchase data suggests that scheduled services are well used by Barnet residents.	Please see additional text in in section on making more efficient use of the road network.	Revise CS9 and supporting text
P e t i t i o n				Save our suburbs	CS9 Providing effective and efficient travel (formerly CS 8)	Ensure that adequate investment in infrastructure such as public transport, doctors' surgeries and utility provision before approving new development. Stop the issuing of on-street parking permits to occupiers of new developments	In line with national planning policy guidance an infrastructure delivery plan will be produced which will provide detail on what infrastructure will be provided and where.  Contributions towards public transport improvements are secured for specific sites as mitigation against the impact of development. Doctors surgeries and utilities are not considered to be part of the Transport Strategy. The Core Strategy supports a parking regime that balances reducing car use while recognising that many residents continue to travel by car. The Development Management policies DPD will provide more detail on car parking standards and policies for Barnet. The approach to the issuing of parking permits for new development reflects the strategy and that was agreed by Cabinet in 2004.	Publish Infrastructure Delivery Plan
241	9	Ian	Dubber	Workspace Group PLC	CS10 Integrated community facilities (formerly CS9)	Workspace supports the development of community facilities and services such as those that provide educational floorspace and leisure, culture and arts facilities. Workspace also considers it important that the council recognises the diverse economic assets these facilities provide within the borough. Workspace has experienced an increase in demand for artists and small cultural venues across London. These facilities could be provided as part of mixed use developments.	The creative sector is recognised as making a significant contribution to Barnet's economy. We recognise the demand for performance and exhibition space in the west of the borough.	Add new para 13.6.3 on creative industries
242	34	Peter	Storey	Friern Village Residents Association	CS10 Integrated community facilities (formerly CS9)	Religious schools divide the community not enhance it.	Please see response at 481/34	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

3 9 9	1			Belsize Square Synagogue , Liberal Judaism, West London Synagogue , Spanish and Portuguese (Sephardi)	CS10 Integrated community facilities (formerly CS9)	<p>The Council's existing UDP in Section 9 "Community Services) at 9.1.2 lists some relevant community facilities; it includes cemeteries. It is recognised by the authority that the provision of such facilities can have an impact on the quality of people's lives and can be important for the social and economic well being of the Borough. Further into section 9 of the UDP specific reference is made to Cemeteries - paragraph 9.3.4.1 - 3 and policy CS15.</p> <p>POLICY CS15 - Cemeteries and Crematoria? The Council will seek to identify appropriate sites for cemeteries or crematoria to meet the needs of the community.</p> <p>In the UDP the council will seek to ensure that adequate provision is made in Barnet to meet the burial needs of all sections of the boroughs community. As part of this process, the council will liaise with the different religious communities in the borough to determine their specific requirements and the demand for, and/or the availability of, reserved burial spaces. The Council will, in conjunction with other authorities and the GLA seek to identify sites to meet those needs.</p> <p>The need for burial space for the Jewish communities of north London remains and has not been met. The Core Strategy Direction of Travel November draft fails to follow through from the UDP to meet this important need. My clients therefore recommend that a short introductory paragraph in Section 15 "Enabling Integrated Community Facilities and Use" be inserted highlighting the need for burial space and the specific requirements of the Jewish communities (as currently exists in the UDP) and a new bullet point is added to Policy CS9 which should read as follows:-</p> <p>"The Council accept that there is a need for further burial facilities for local communities and will therefore support further provision of such facilities to meet that need"</p> <p>My clients are currently pursuing a planning application to extend the existing Edgwarebury Cemetery. If approved and implemented this will meet the immediate and long term needs of four of the Jewish communities in North London.</p>	<p>The issue of providing burial spaces for London and addressing the needs of its diverse communities is a complex one which cannot be simply addressed by a borough acting alone. This was highlighted in Barnet's UDP. The draft revised London Plan highlights that there has not been an assessment of burial space in London for over 10 years and it is clear that the Mayor has to work with boroughs and cemetery providers to establish what is the current situation with regard to supply. This assessment should look at barriers to supply including the re-use and reclamation of burial space. The LDF is an evidence based document and it is imperative that evidence is up to date. We understand that the Mayor will commence work on this assessment in Summer 2010</p> <p>The Core Strategy is not the appropriate document to identify burial sites. We are producing a Site Allocations document and opened two public periods of Site Suggestions in February 2010 and May 2010 for sites to come forward. Despite this information gathering exercise the applicants have not put forward a proposal for the extension to Edgwarebury Cemetery nor evidence to support such a proposal. The Infrastructure Delivery Plan sets out the what, where, when and how much of infrastructure delivery and is a key piece of supporting evidence for the LDF. The IDP highlights that we are awaiting work by the Mayor on the provision of cemeteries and crematoria.</p>	None
4 1 8	7	Julia	Hines	Age Concern	CS10 Integrated community facilities (formerly CS9)	<p>We welcome the integrated use of community facilities, but also feel that older people will benefit from facilities geared particularly for them. Older people have asked for parking permits to allow them to use day centres and community facilities in residential areas where there are parking restrictions. In addition, these facilities should be easily accessible by public transport.</p>	<p>Access by public transport is an important consideration for community facilities and it is important that design of community facilities takes into account the range of users.</p>	None
4 1 8	1 9	Julia	Hines	Age Concern	CS10 Integrated community facilities (formerly CS9)	<p>We are concerned about the apparent lack of inclusion of facilities for older people within the community hubs. We would like to see this as policy. We are concerned that there will be a policy to reduce day centres irrespective of a proven demand and increasing elderly population, without any obvious alternatives to prevent the "four walls" problem that effects many isolated older people, both with and without cognitive impairment/ dementia. Reducing day centres may also have a negative impact on carers, many of whom are also older people.</p>	<p>The policy and supporting text is not intending to reduce support for facilities for older people.</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 2 6	2	Pam	Edwards	Barnet Borough Arts Council	CS10 Integrated community facilities (formerly CS9)	On the first point, after "pools" change community" to read "community , arts and tourism meeting places" On the third point on the next page "multi-purpose community hubs" should be amended to read "multi-purpose community, arts and tourism hubs". "the insertion of the words "community, arts and tourism" after the words "multi-purpose" "the insertion of the words "community, arts and tourism" after the words "demand for" and before "spaces"	Multi-purpose community hubs cover a range of activities and this could include arts and tourism	None
4 2 6	5	Pam	Edwards	Barnet Borough Arts Council	CS10 Integrated community facilities (formerly CS9)	While the Core Strategy comments on leisure centres, these are sports centres run by Greenwich Leisure, each one tailored to the lay-outs for particular sports. We request that arts centres also be separately defined, as venues that are licensed for public performances are each unique and often specialised for particular art forms. While there are many rooms suitable for use for clubs, classes, meetings and rehearsals, the spaces for public performance of theatre, dance, musical theatre and music are limited in number and mainly on the western side of the Borough. There is also a shortage of spaces for exhibitions and, while no licences are needed, open access is required to well lighted wall and floor spaces, and this does not always allow for sharing with other activities.	An additional sub section on Arts and Culture is included in the Publication version of the Core Strategy	New section 15.5 on Arts and Culture

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 2 6	6	Pam	Edwards	Barnet Borough Arts Council	CS10 Integrated community facilities (formerly CS9)	<p><b>Arts Centres</b></p> <p>The purpose-built arts depot at North Finchley has in its first 5 years established a strong programme of professional theatre, music and dance performances together with public exhibitions. It is accorded the status of an RFO (a Regularly Funded Organisation) by the Arts Council of England which enables it to then apply and receive support from many trusts and other sources. There is a strong programme of educational clubs and classes, and a third programme of professional artists working to offer support and development to many disadvantaged groups across the Borough through specialised projects. The larger auditorium seating just under 500 has an adjustable floor that may either lie flat for conferences and dances, or be sloped with seating, while the smaller studio seats about 150 in stepped tiers. The foyer, café and art gallery act as a social centre and meeting place, a drawing room for the Borough. Also in the building are Barnet College's dance and theatre departments and Community Focus offering clubs and classes that include many designed especially for disabled and elderly people.</p> <p>The whole building has excellent disabled access</p> <p><b>Local music and theatre events requiring a Public Performance Licence</b></p> <p>While arts depot is acting as a regional centre, not only for the Borough but for much of North London, a lively programme of 100 or more semi-professional and amateur groups meet, perform and exhibit in a variety of venues across the Borough. Orchestral and choral performances are mainly in places of worship which have large spaces with facilities upgraded to cater for public performances, including St John the Baptist in Barnet, Trinity Church in North Finchley, St John's in Friern Barnet, St Judes and the Free Church in Hampstead Garden Suburb, All Saints in East Finchley, St Michaels in Mill Hill and John Keble Church in Mill Hill. Alyth Synagogue and Henrietta Barnett and Queen Elizabeth</p> <p>Amateur theatre performances are held in the specialised Incognito Theatre in Friern Barnet, The Bull Theatre in Barnet, All Saints Arts Centre in Whetstone, John Keble Church in Edgware, Finchley Methodist Church, Hartley Hall in Mill Hill, and Henrietta Barnett School and other venues. Standards are stimulated by BBAC's annual Drama Competition where an adjudicator travels to review and assess member societies' performances, and the societies act as a training resource for young people. Since the professional programme at The Bull moved on into arts depot, The Bull is able to house a succession of weekly hires to amateur groups, as was intended when it was built as a community arts centre. The seating for 150 in the air-conditioned upper auditorium is about to be upgraded, while the downstairs dance studio seats about 70. Daytime use is as a full time theatre school. Incognito's theatre, which also has stepped seating, is completing fundraising to upgrade their building, as is the Phoenix Cinema</p> <p>The only spaces exempt from a licence for public performance are churches, and also schools so long as the event is for pupils &amp; their families – if the public are to be admitted to performances then a licence is required. Pubs used to be able to have one or two live musicians performing (the 'two in a bar rule') but now have to have a performance licence and as this may involve building work it can be a deterrent. The Government is being lobbied to amend the Licensing</p>	<p>The council does appreciate the submission of this information but considers it as too detailed for inclusion in a higher level strategic document. Arts and Culture do form a feature of this Core Strategy in recognition of the level of participation of groups and the level of activity in the creative industry. The Core Strategy recognises the contribution of groups to arts and cultural activities in Barnet and highlights the demands for exhibition and performance space. The temporary re-use of vacant retail space for such uses is encouraged. We have highlighted the importance of the schools estate for performance space and cultural events. Whilst recognising its importance as a global event the Core Strategy has a 15 year life span starting in 2011 looking beyond the 2012 Olympics.</p>	<p>Add new section 4.12 – Barnet and the arts, culture and creative industry Para 11.9.6 supports temporary re-use of vacant retail space in town centres for performance and creative work New section 15.5 on Arts and Culture</p>
-------------	---	-----	---------	--------------------------------------	--	---	---	--

**Representations for Core Strategy Direction of Travel and Council's Response and Recommendations**

--	--	--	--	--	--	--	--	--

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 2 6	7	Pam	Edwards	Barnet Borough Arts Council	CS10 Integrated community facilities (formerly CS9)	<p>A STRATEGIC PARTNERSHIP has been developed between the Boroughs of Barnet, Enfield and Haringey with the encouragement and support of the Arts Council of England, and a recently published Arts Map (enclosed) lists centres and facilities across North London.</p> <p>Extracts below are from this comprehensive document which reviews existing facilities and suggests expansion in the Borough of Enfield. See <a href="http://www.barnet.gov.uk">www.barnet.gov.uk</a></p> <p>Some important POLICIES are listed within the Creative Arts Enfield document , as follows</p> <p>ARTS COUNCIL ENGLAND develops and promotes arts and creative practice across England, acting as an independent body at arm's length from Government. Between 2008 and 2011 they will invest over one billion pounds of public money from both the Government and the National Lottery to support arts organisations, individual artists and arts infrastructure. ACE believes that the arts have the power to change lives and communities, and that active participation in arts activities can. Barnet, Haringey and Enfield Councils have come together in a partnership with financial assistance from the Arts Council of England, to develop marketing of the arts and creative industries in North London as part of the build up to the Olympic. This will help to focus efforts on promoting the arts, to encourage inward investment. Visit London report that there is likely to be an increased visitor market projected over the next few years due to the effects of the current recession and the likelihood that it may deepen over the next 18 months – 2 years.</p> <p>The Arts Council of England is also supporting various development initiatives across London such as "On The Map" which brings together theatres and arts centres in outer London boroughs to coordinate artistic projects and market the arts to Londoners and their visitors.</p> <p>With the 2012 Olympic Games we have an once-in-a-lifetime opportunity to enhance our cultural landscape, encourage even greater participation in arts and sports, and showcase our creativity to the rest of the world. That is why funders must hold their nerve and keep supporting arts and cultural organisations in the current economic climate. The Cultural Olympiad will provide the build up and platform to reinvest and think more widely about the potential of events across the Borough and every neighbourhood should be encouraged to begin to plan and to celebrate what the Olympics means to them and what they hope to achieve by aiming high through the arts and creative industries. The Olympics will provide a sense of excitement and motivation that will inspire young people to try something new and strive to do their best.</p> <p>The Royal Society of Arts, Manufacture &amp; Commerce (RSA) is doing a lot of work on social policy, community engagement, citizenship, youth engagement and the arts. The Society is developing a strain of work around the EU and social policy from which Enfield could benefit. The Society's work with young people and social policy could help Enfield to look at our international links and</p>	<p>We refer to our previous answer at 426/6. Creative industries are recognised as a significant part of our local economy</p> <p>We have carried out Core Strategy consultation at the Issues and Options and Direction of Travel stage. The Alternative Options were removed on the basis of the Sustainability Appraisal</p>	<p>Text to be amended as set out at 426/6</p> <p>Add new para 13.6.3 on creative industries</p>
-------------	---	-----	---------	--------------------------------------	--	---	---	---

**Representations for Core Strategy Direction of Travel and Council's Response and Recommendations**

--	--	--	--	--	--	--	--	--

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 2 6	8	Pam	Edwards	Barnet Borough Arts Council	CS10 Integrated community facilities (formerly CS9)	<p>We feel that there are bound to be the need at times in the future to adjust the use and location of buildings and their programmes for community and arts use. We entirely agree with the sentence that "Community facilities cannot compete financially on the open market against higher land use values such as housing or offices."</p> <p>For this reason we think that the alternative options should continue to be incorporated in the Core Strategy. In the first option the word "and" should be inserted between "Allow" and "Protect" .</p> <p>The strategies are particularly relevant to buildings used for public performances. Whereas meetings can be held in a variety of rooms and spaces, performances require a public licence and can be as specialised for the arts as they are for particular sports. Therefore existing assets should be protected by the Borough Council strategies unless it can be demonstrated that they are no longer required or will be provided elsewhere. While new facilities may be encouraged in hubs there is such a variety of buildings already scattered across the Borough where events are successfully presented, we believe they should be allowed and encouraged to develop where they are. Many of the venues have themselves already evolved into local hubs, particularly places of worship that usually have a hall and sometimes a school attached.</p>	<p>The Direction of Travel has set out Barnet's preferred approach and the reasons why alternative options have been discounted.</p> <p>The lack of performance space is recognised in the Core Strategy and as part of the Infrastructure Delivery Plan.</p>	Publish Infrastructure Delivery Plan
4 2 6	9	Pam	Edwards	Barnet Borough Arts Council	CS10 Integrated community facilities (formerly CS9)	The possibility of an arts venue at Brent Cross to be explored	Provision has been made in the outline application for 1,000sqm for multi-use community space in two locations (2,000 in total). It is intended that this is co-located with other community space such as education, health or library therefore any venue will be multi-use space. This space is identified for general community use, faith provision, access to information technology and arts and cultural use. There will be scope via a Planning Obligation at the detailed design stage for the public squares and open spaces to consider outdoor performance space and art in the public realm.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 2 6	1 0	Pam	Edwards	Barnet Borough Arts Council	CS10 Integrated community facilities (formerly CS9)	<p>There is no reference to local festivals, and it would appear that these are not included in the Open Space, Sport and Recreational Facilities Needs Assessment. Festivals can greatly improve the quality of life in their area, involving many local people and stimulating community cohesion in a neighbourhood. The Borough Council arranges for annual licensing for public performance in particular parks. The events in green spaces can be small and simple or can require a great deal of equipment to arrange performances on stage, with marquees and stalls for charities, crafts and community groups, and also act as a showcase for commercial companies. They would benefit from upgrading of pavilions, toilet facilities and good access.</p> <p>The attendance can be anything up to 20,000 people, and the usual addition of a funfair is popular and helps to finance the events. More festivals in green spaces could be developed in the Borough.</p> <p>The usual annual programme includes</p> <p>Late June East Finchley Festival in Cherry Tree Park N2 Early July East Barnet Festival in Oak Hill Park, EN4 see <a href="http://www.eastbarnetfestival.org.uk">www.eastbarnetfestival.org.uk</a></p> <p>Mid July Finchley Pentland Community Festival, N3 Mid August Friern Barnet Summer Show N10/N11/N12 September Watling Festival in Montrose Park HA8 Grahame Park Festival, NW9</p> <p>Also on June-August weekends Theatre in the Park in Oak Hill Park EN4 June &amp; July Open air theatre in Little Oak Wood NW11 by Garden Suburb Theatre</p> <p>1st Sunday December Barnet Christmas High Street Fair</p> <p>'Please insert the words "and festival" after "sports" in the third point on securing improvements.</p> <p>'Please add the words "community, arts and tourism" after the word "multi-purpose".</p> <p>'Please insert the words "community, arts and tourism" after the words "demand for" and before "spaces".</p>	We recognise the importance of festivals to the community and the use of open spaces. An additional sub section on Arts and Culture will be included in the Publication version of the Core Strategy	Add reference to festivals in open spaces in para 12.1.6
4 3 5	1	Roger	Tichborne		CS10 Integrated community facilities (formerly CS9)	Please amend the first paragraph as follows...The Council will work with our partners to ensure that world class community facilities including schools, libraries, sports centres and pools, community meeting places and facilities for younger and older people, are provided for Barnet's communities	World class is a subjective criteria and not a recognised standard.	None
4 3 5	2	Roger	Tichborne		CS10 Integrated community facilities (formerly CS9)	<p>I believe that the subject of provision of sports facilities is not addressed adequately by this document, warranting a mere 3 paragraphs. That is a scandal for a Borough of 330,000 people. I would specifically suggest that the following are written into the plan :-</p> <p>a) Restore Pavilion Road playing fields as a proper sports facility, b) Protect by law all playing fields in the Borough of Barnet</p> <p>c) Upgrade Cophall Swimming pool to have an Olympic standard 50 meter pool, to allow our young swimmers to compete on an even footing with other clubs. Barnet is the 9th Largest authority in the Country and there is not a single 50m pool.</p> <p>d) Install an Olympic specification diving board at Cophall Pool. It is ridiculous that our athletes have to travel to Crystal Palace to train.</p> <p>e) Place a legal requirement on the council to maintain all sports pitches to the highest standard. Many youngsters are missing vital exercise due to poorly maintained Council Facilities.</p> <p>f) Renovate Cophall Stadium</p>	<p>The Site Allocations DPD is the appropriate document for site specific considerations such as any improvement at Cophall.</p> <p>The Core Strategy is a strategic document which clearly identifies sport facilities as part of the infrastructure requirement to support growth. We are preparing a playing pitch strategy which will follow sport England's guidance and will guide future provision of and management of such facilities See our response at 432/3 on the Leisure Facilities Strategy</p> <p>Setting rents for the next 100 years is not realistic and is not a matter within the remit of the LDF.</p>	Publish Infrastructure Delivery Plan

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

441	1	Warren	Forsyth	Middlesex University	CS10 Integrated community facilities (formerly CS9)	The University supports Policy CS 9 - Enabling Integrated Community Facilities and Uses and suggests that a further bullet point be added along the lines: "work in partnership with Middlesex University and other further and higher education providers to facilitate the improvement of leisure and recreational facilities for joint or shared educational and community usage."	Policy CS 10 highlights partnership working already so an additional reference is not merited	None
443	8			Metropolitan Police Authority	CS10 Integrated community facilities (formerly CS9)	<p>This policy deals with the provisions of community facilities. The MPA requested within their previous representations that policing facilities should be referred to within this section. Unfortunately this was not taken on board and the MPA would therefore like to reiterate the importance of policing facilities being recognised as a community facility and the need to ensure that double counting of replacement community facilities does not occur.</p> <p>The MPA recommend amendments to this policy to ensure this aspect of the emerging Development Management Policy document is consistent with Policy 3A.18 of the London Plan. This included police facilities within the definition of 'community facilities' and states that the net loss of community facilities must be resisted.</p> <p>Furthermore, several London Borough's have made amendments to their emerging planning policy to support this approach, these include Policy C2 of Greenwich's UDP (adopted 2006) and Policy CK1 (section c, iii) of the Royal Borough of Kensington and Chelsea (emerging).</p> <p>Recommendation: The MPA suggest that the wording to this paragraph be changed to read - the council will work with our partners to ensure that community facilities including schools, policing facilities, libraries, leisure centres and plos, community meeting places and facilities for younger and older people are provided for Barnet's communities.</p> <p>We will:</p> <ul style="list-style-type: none"> <li>- resist any development that would lead to a net loss of community facilities.</li> </ul> <p>Replacement community facilities elsewhere in the borough will be acceptable in line with a current strategy for reprovision.</p>	Both health and safety are addressed as separate Core Strategy policies and in these sections we make it clear how we support the policies of our partners. A separate reference in CS9 is therefore not required.	None
453	1			Her Majesty's Court Service (HMCS).	CS10 Integrated community facilities (formerly CS9)	<p>The thrust of this Policy, which is reflected in the Strategic Objectives (page 20), is generally supported. We support the retention and enhancement of existing community facilities, as well as the expectation of appropriate contributions from development towards improving existing provision. However, it is our experience that whilst schools and health care services are typically addressed as part of community and infrastructure needs, the role that the courts play in the community is often overlooked. We therefore suggest the following amendment to Policy CS9:</p> <p>"The Council will work with our partners to ensure that community facilities including schools, libraries, leisure centres and pools, community meeting places, criminal justice facilities, and facilities for younger and older people, are provided for Barnet's communities."</p> <p>For consistency purposes, we also suggest that the following amendment be made to supporting paragraph 15.1.2:</p> <p>"Many community services and facilities are provided by our partners such as Barnet College, Barnet Voluntary Service Council, the Metropolitan Police, and Her Majesty's Court Service."</p>	We seek community facilities that are capable at being used efficiently and are integrated with other uses. Criminal courts by virtue of their explicit function are not flexible community facilities.	None
455	32	Mike	Dawson	Finchley Society	CS10 Integrated community facilities (formerly CS9)	We support these policies. Community facilities within town centres are particularly useful, offering a sustainable facility to the surrounding community.	We welcome this support	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

461	1	Rober t	Goymour		CS10 Integrated community facilities (formerly CS9)	<p>And ask Barnet Council to include some specific targets for developing new leisure facilities so that the Council and its partners can then be held to account.</p> <p>The word "adequate" should be added to Policy CS9 first line. It should then read: "The Council will work with our partners to ensure that adequate community facilities including schools, libraries, leisure centres and pools, community meeting places and facilities for younger and older people, are provided for Barnet's communities."</p>	The wording proposed is inappropriate for a strategic document. Adequate is subjective. In line with national planning policy guidance an infrastructure delivery plan will be produced which will provide detail on what infrastructure will be provided and where.	Publish Infrastructure Delivery Plan
477	33	Andre w	Newby	Barnet Green Party	CS10 Integrated community facilities (formerly CS9)	The Green Party does not believe that the state should provide funding or other assistance to religious schools.	Please see response at 481/34	None
478	29	Steve n	Deller		CS10 Integrated community facilities (formerly CS9)	Religious discrimination should no be supported in any aspect of community life	Please see response at 481/34	None
478	30	Steve n	Deller		CS10 Integrated community facilities (formerly CS9)	Except in Cricklewood where the council has been actively withdrawing all affordable services	The Core Strategy is a borough wide document.	None
481	34	David	Dobbs		CS10 Integrated community facilities (formerly CS9)	On a personal level I don't consider an expansion of religious schools as desirable.	In providing new schools we aim to address educational needs and respond to the need for parental choice. Where there is proven demand within Barnet and premises can conform with the Department of Education guidance on primary and secondary schools there will be opportunities for such establishments to join the maintained schools sector. This could include faith schools.	None
483	33	Maria	Nash	Barnet Women's Design Group	CS10 Integrated community facilities (formerly CS9)	All these need to be wheelchair accessible because to date sadly only lip-service has been in place in Barnet and all community facilities are not accessible for wheelchair users	New non domestic facilities or extensions to such facilities will be required to meet Building Regulations Part M.	None
483	34	Maria	Nash	Barnet Women's Design Group	CS10 Integrated community facilities (formerly CS9)	There should be a Youth Shadow Council for all young people living in Barnet to ensure all young people's input and not only through the School's system because not all children that live in Barnet and use Barnet's community facilities go to Barnet Schools because all schools that are engaged with the youth system have children that do not live in Barnet because they come from out of borough and are not interested in Barnet's facilities There also needs to be inclusion of 'good' children in youth services provision and not the constant manipulation of these services for 'Bad' children. Anti social behaviour can be seen as a reward to getting services.	Youth engagement in the Planning Service is an issue best addressed by the review of the Statement of Community Involvement.	None
483	35	Maria	Nash	Barnet Women's Design Group	CS10 Integrated community facilities (formerly CS9)	Segregation creates more problems Equality means everyone in equal all the time not a game that can be chosen by the individual when ever they want to manipulate a situation Religious schools should be there for those who want to practice their individual religious choice and not force any other person to share in their beliefs this should only be done at University when the youth have reached majority and can make up their own minds	In providing new schools we aim to address educational needs and respond to the need for parental choice. Where there is proven demand within Barnet and premises can conform with the Department of Education guidance on primary and secondary schools there will be opportunities for such establishments to join the maintained schools sector. This could include faith schools.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

483	36	Maria	Nash	Barnet Women's Design Group	CS10 Integrated community facilities (formerly CS9)	Involve all communities for this provision not only BMERs but women, elderly and disabled groups	As part of our extensive engagement on the LDF we seek to ensure that representative groups such as Disabled Action Barnet and the Barnet Mental Health Network have the opportunity to participate in the process on behalf of people with such conditions.	None
483	37	Maria	Nash	Barnet Women's Design Group	CS10 Integrated community facilities (formerly CS9)	Not 'new and accessible facilities' but new accessible facilities because it should not be either or. All community facilities should be fully wheelchair and sensory/hearing accessible	New facilities will be required to meet Building Regulations Part M.	None
487	29	Michael	Storey		CS10 Integrated community facilities (formerly CS9)	More leisure centres and swimming pools. Provision in the north of the borough is nothing short of a scandal.	The Core Strategy is a strategic document which clearly identifies sport facilities as part of the infrastructure requirement to support growth. We are preparing a playing pitch strategy which will follow sport England's guidance and will guide future provision of and management of such facilities. An infrastructure delivery plan setting out the where, when, what and how of infrastructure delivery will accompany the publication version of the Core Strategy. Please see response at 432/3 on the Leisure Facilities Strategy	Publish Infrastructure Delivery Plan
487	31	Michael	Storey		CS10 Integrated community facilities (formerly CS9)	But that doesn't mean the developments should be granted planning permission in the first place.	Infrastructure that supports growth is a basic tenet of the planning system.	None
	7	John	Dix		CS10 Integrated community facilities (formerly CS9)	Section 15.4 deals with Leisure Centres and Swimming Pools. At 15.4.1 the wording is ambiguous and implies that there are seven swimming pools in Barnet when there are in fact only 3. I would therefore like the wording on paragraph 15.4.1 to be amended to include the word "three" before the word "pools" on the second line of this paragraph. The LDF fails to recognise that there is a shortfall in facilities in the Borough, particularly swimming pools and fails to set any specific targets for the development of new leisure facilities. I would therefore like to see the word "adequate" added to Policy CS9 first line so that it reads "...partners to ensure that adequate community facilities..." and to include some specific targets for developing new leisure facilities with which the council can then be held to account.	An infrastructure delivery plan setting out the where, when, what and how of infrastructure delivery will accompany the publication version of the Core Strategy. Please see response at 432/3 on the Leisure Facilities Strategy. Adequate is a subjective term and should not form part of the Core Strategy	Publish Infrastructure Delivery Plan
436	10	Robert	Newton		CS11 Health and well being (formerly CS10)	Add a new bullet point that reads: "Engage with the Government over hospital provision for the Borough that appears to be outside the scope of the London Plan and the Borough's Local Development Framework but is essential for the well being of existing Borough residents and projected growth in new residents over the plan period."	NHS Barnet has identified their needs in delivering modern primary care and this is reflected in the Infrastructure Delivery Plan. Hospitals are integrated and therefore any proposals for them in the next 15 years are highlighted in the IDP. Any changes in provision will be addressed by the review of the Core Strategy.	None
439	7	Zenda	Green	Mill Hill Preservation Society	CS11 Health and well being (formerly CS10)	In promoting more healthy and active lifestyles, the policy fails to acknowledge the value or promote investment in Barnet's open spaces to support healthier neighbourhoods.	A clear link between open space and health is made in the supporting text.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 5 5	3 3	Mike	Dawson	Finchley Society	CS11 Health and well being (formerly CS10)	New Primary Care centres should be located in sustainable locations such as town centres, which must be easily accessible by public transport. We are concerned that closure of existing GP surgeries in the suburbs will result in access to new alternative facilities being at unsuitable sites, which are not sited in locations as suggested in National and Regional guidelines. Include a new bullet point after bullet point one, to read: • new GP surgeries/Primary Care Centres will be built at sustainable locations, to include town centres, which must be easily accessible by public transport;	We encourage in Policy CS9 the provision of new community facilities in the town centres, our most accessible locations.	None
4 6 7	3 8	Pauline	McKinnell	Cricklewood Community Forum	CS11 Health and well being (formerly CS10)	Think existing care homes should be retained otherwise people are forced to use private sector.	Our aim is to help people live independently. The provision of residential care is about meeting actual needs. For such care we want to broaden the range of choice for older people's accommodation.	None
4 7 2	2	Jan	Chairman	NHS Barnet	CS11 Health and well being (formerly CS10)	We strongly welcome reference to the Joint Strategic Needs Assessment (JSNA) in the list of evidence base documents to support the LDF set out in paragraph 4.12. We would stress that the baseline health conditions of the borough should be understood and outlined in the LDF. This can be taken from existing documentation such as the JSNA, and confirmed through discussions with the PCT. This should outline the health objectives that the document will seek to address through the planning process. Similarly, health deprivation issues should be addressed through this document. This should be monitored through appropriate indicators to understand improvements in health through the Annual Monitoring Report (AMR).	We have incorporated text on health inequalities from the Primary and Community Care Strategy of NHS Barnet	Revise supporting text for CS 11
4 7 2	4	Jan	Chairman	NHS Barnet	CS11 Health and well being (formerly CS10)	We support the identification of the wide variety of challenges facing the borough to be addressed through the LDF, particularly including tackling deprivation, supporting growth, social Infrastructure provision and encouraging healthy lifestyles. We would also welcome reference to the need to tackle health inequalities which are closely related to deprivation and disadvantage. We would suggest that the Core Strategy refers to and specifies the relationship between health conditions and the determinants of health which would underpin a cross-cutting approach to reducing health impacts, encouraging healthier lifestyles and reducing health inequalities. We also support the identification of the likely changing population trends in the borough set out in paragraph 5.1.7 and the need to plan to meet these changing needs. Close working with partners including the PCT will be important in meeting these changing needs.	We refer to our earlier answer on health inequalities. In delivering the Core Strategy we highlight our Engagement Agreement with NHS Barnet	Revise supporting text for CS 15

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 7 2	6	Jan	Chairman	NHS Barnet	CS11 Health and well being (formerly CS10)	<p>We strongly welcome this chapter. We would stress health and well being is a cross cutting issue and would ideally be expressed throughout the LDF in addition to Chapter 16 and Policy CS 10: Improving health and well being in Barnet. Chapter 16 represents the health and well being issues of the borough moving forward. We particularly support reference to the shift in healthcare service provision to a hub and spoke model, health provision mechanisms and encouraging healthier lifestyles. It would be useful if this chapter could be linked to others within the Core Strategy where links to health and well being have been identified, such as open space provision, accessibility, air quality, etc. For more information on these links please refer to 'The health impacts of spatial planning decisions', The King's Fund, April 2009 (<a href="http://www.healthyrbanddevelopment.nhs.uk/documents/news_and_events/20090921_using_spatial_planning_to_deliver_health_outcomes/Kings_Fund_spatial_planning_report_April_2009.pdf">http://www.healthyrbanddevelopment.nhs.uk/documents/news_and_events/20090921_using_spatial_planning_to_deliver_health_outcomes/Kings_Fund_spatial_planning_report_April_2009.pdf</a>). We support references within Chapter 16 to key documents and groups, including the JSNA, Health and Well-being Commissioning Framework, Adult Strategy Group and the Older Adult's Strategy. We may also suggest the Council reviews the Barnet Primary Care Strategy (<a href="http://www.barnet.nhs.uk/ec/Folders/PreviewDoc.asp?id=3772">http://www.barnet.nhs.uk/ec/Folders/PreviewDoc.asp?id=3772</a>), which outlines the vision for community and primary care in Barnet. It focuses on the objective of making a significant shift of services from secondary to primary care to increase the number of local services.</p>	<p>We do recognise health as a cross-cutting theme. We have incorporated text from the Primary and Community Care Strategy of NHS Barnet</p>	<p>Revise supporting text for CS 11</p>
4 7 2	7	Jan	Chairman	NHS Barnet	CS11 Health and well being (formerly CS10)	<p>The identification of specific health issues in Barnet in paragraph 16.2.1 is welcome, alongside confirmation of the commitment to encouraging healthy lifestyles and tackling health inequalities, as set out in the JSNA. It may also be useful to link these issues with planning interventions to be delivered through the Core Strategy and LDF, such as encouraging physical activity through increased access to open space. We would suggest the inclusion of a map illustrating health deprivation levels across the borough could be included in the Core Strategy, to help to identify where investment, regeneration and other mechanisms should be focussed.</p>	<p>Improving access to open space and increasing opportunities for physical activity is covered under our Core Strategy policy on open spaces. We have highlighted the links between health and deprivation. The Infrastructure Delivery Plan sets out where the health infrastructure is going to be delivered.</p>	<p>Add Map on Deprivation in Barnet</p>
4 7 2	8	Jan	Chairman	NHS Barnet	CS11 Health and well being (formerly CS10)	<p>Confirmation of Barnet's healthcare needs is welcome, including the projected oversupply of residential care homes outlined at section 16.4. Confirmation that this has considered the aging population as well as the planned housing growth for the borough would be welcome. Paragraph 16.4.3 notes the additional costs to the PCT of new care homes in the borough. For clarity, it may also be useful to note that developers will be required to contribute towards additional healthcare service provision required (both revenue and capital funding) until the next funding review.</p>	<p>The Core Strategy recognises the ageing population. We do not want to make reference to S106 SPDs until we are certain of our approach on CIL. Our model on the ageing population is linked to housing growth. Barnet's SPD on Contributions to Health from Development sets out when we will seek S106 funding</p>	<p>None</p>
4 7 7	3 6	Andre w	Newby	Barnet Green Party	CS11 Health and well being (formerly CS10)	<p>Clause (b) is excellent. Clause (a) should be struck out because it is not Barnet Council's role to give unquestioned support to NHS Barnet's plans, which could change. Support should be given only on a case-by-case basis. Clauses (c) and (d) are purely political aims which have no place in a strategic document of this nature.</p>	<p>NHS Barnet is a strategic partner with whom we work closely in the development of these plans. The oversupply of residential care homes are a strategic issue which should be addressed in the Core Strategy. Our aim is to help people live independently and broaden the range of choice for older people's accommodation.</p>	<p>None</p>

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

483	38	Maria	Nash	Barnet Women's Design Group	CS11 Health and well being (formerly CS10)	I strongly disagree with d) Any provision should be needs led and with the large elderly population of Barnet there will be an increase in the need for additional residential care homes who need specialist 24/7 care elderly and disabled people need to be involved in these policies	Please see response to 477/36	None
484	37	Linda	Morris	Edgware Community Hospital	CS11 Health and well being (formerly CS10)	Throughout the document you refer to the development of local Primary Care facilities in line with the NHS Barnet's Polysytem approach. However we believe that this should read Primary and Community Care as local GP surgeries are currently supported in their work by a wide range of community services such as district nursing, health visiting and intermediate care services. These services will increase over time in line with government policy and will be increasingly locally focussed in their approach. It is important therefore that the needs of these services are factored into the development of "hub and spoke" facilities. Provider care closer to or in the home will reduce travelling as well as improving access to services for vulnerable groups. 'We are sure that the use of Primary Care in the document is shorthand for the wider range of services provided in the community but felt it necessary to ensure that this was the case and hopefully to ensure that this is clear in any final documents.	We recognise the provision of community services and the need to provide care closer to the home.	Revise supporting text for CS 11
488	51	Glen	Rollings	Greater London Authority	CS11 Health and well being (formerly CS10)	Under sections 16: Improving Health and Well being (Policy CS10) and 18: Ensuring efficient use of natural resources (Policy CS12), both of these policies should explicitly express the need to target a significant mode shift to walking and cycling, away from use of the motor car.	We do not agree that there is a need for duplication as we have made our approach clear in CS 9 on providing effective and efficient travel.	None
418	21	Julia	Hines	Age Concern	CS12 A safer place (formerly CS11)	We support the policy of making Barnet a safer place	We welcome this support	None
439	8	Zenda	Green	Mill Hill Preservation Society	CS12 A safer place (formerly CS11)	Policy CS11- Making Barnet a safer place (P85) With the increased development at Mill Hill East with what we consider to be too higher density especially near the Mill Hill East Train Station we would expect some new provision for police presence in this area, maybe located in old Officers Mess Building.	The opportunity to specifically comment on the growth in Mill Hill East was during the development of the Area Action Plan.	None
443	9			Metropolitan Police Authority	CS12 A safer place (formerly CS11))	Paragraph 17.1.6 of this chapter states that the borough will expect development proposals to reflect guidance in the government publication Safer Places: The Planning System and Crime Prevention (2004) and the principles of Secured by Design the official UK Police flagship initiative for designing out crime. The MPA support this statement. Paragraph 17.1.7 states that greater collaboration with the Metropolitan Police and Barnet Safer Communities Partnerships is desired. The MPA support this statement. Paragraph 17.1.8 outlines the Metropolitan Police Authority's Asset Management Plan. The MPA are currently still developing this strategy, however, support the summary provided.	We welcome this support	None
443	10			Metropolitan Police Authority	CS12 A safer place (formerly CS11)	Policy CS11 highlights the borough's strategy to make Barnet a safer place. The MPA support the 6 bullet points within this policy and support the reference to working alongside the MPA.	We welcome this support	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 4 6	1 5	Graham	Saunders	English Heritage	CS12 A safer place (formerly CS11)	Support in general the commitment to making Barnet a safer place, through the use of appropriate security and community safety measures in buildings and spaces. However we would seek to ensure that when these measures are being designed that the local character and context of a place is carefully considered. In particular in sensitive areas such as conservation areas and listed buildings we would advise that the heritage value of these assets are carefully identified and valued as part of the process of developing security and community measures. It is important to avoid measures being introduced that would have an adverse impact upon the historic environment or the local character and context of an area. The policy and the supporting text should make reference to this issue. Maybe cross reference Policy CS3 and any new heritage Core Strategy policy.	We will provide a Development Management Policies DPD and policy framework for the sensitive consideration of these issues.	None
4 5 3	2			Her Majesty's Court Service (HMCS).	CS12 A safer place (formerly CS11)	HMCS plays a key role in the delivery of safe and secure neighbourhoods and communities, Alongside other delivery partners, such as the Metropolitan Police. HMCS provides a key, front line service in addressing crime reduction and public safety: a service that will be pressurised by the proposed growth in the Borough through the strategic delivery of development. We accordingly support the thrust of this policy; however, it should be amended to include HMCS explicitly in reference to the delivery of required social infrastructure to meet community needs and to support development and growth in the Borough. We suggest the following be added to the bullet point list contained within Policy CS11: ."We will aim to make Barnet a safer place. We will: work with Her Majesty's Court Service as it reviews its estate to ensure it best meets modern and evolving needs for court facilities, thus ensuring efficient and effective delivery of its services and improved flexibility to allow for future changes in response to new pressures and requirements.'	The Site Allocations DPD is the appropriate document for site specific considerations and we would expect HMCS to put forward proposals as part of this process. In order for courts to be considered as social infrastructure and an integrated part of our Infrastructure Delivery Plan we would expect HMCS to provide further information linking Barnet's growth with their needs to accommodate it	None
4 7 8	3 2	Steven	Deller		CS12 A safer place (formerly CS11)	Building new developments next to disadvantaged communities has been proved to increase crime. Yet you are doing this in Cricklewood	We highlight that community cohesion needs to be measured across Barnet with a focus on growth areas such as Cricklewood and the areas that surround them.	Publish monitoring indicators in Appendix B for measuring community cohesion
4 8 3	3 9	Maria	Nash	Barnet Women's Design Group	CS12 A safer place (formerly CS11)	All sectors of the community should be included in this	We have carried out extensive consultation on the Core Strategy which has generated over 2,100 comments from 334 individual responses.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

241	10	Ian	Dubber	Workspace Group PLC	CS13 Efficient use of natural resources (formerly CS 12)	<p>Workspace request that caution is taken when considering its carbon reduction strategy, as such requirements may stifle the regeneration and growth objectives for Barnet. PPS1 states that the local planning authorities should ensure that development plans address potential impacts upon climate change including through policies which seek to reduce energy emissions and promote the development of renewable energy resources. The advice in PPS1 has been clarified and developed further through the publication of 'Planning and climate change' a supplement to PPS1. Under the heading 'Testing local requirements' paragraph 33 of the climate change supplement advises that any policy relating to local requirements for energy supply should ensure what is proposed is evidence based and viable having regard to overall costs of bring sites to the market.</p> <p>In the case of housing development it is stated that the policy approach should demonstrate that the proposed approach is consistent with securing the expected supply and pace of development shown in the housing trajectory required by PPS3 and does not inhibit the provision of affordable housing. Workspace considers that the council should not impose rigid requirements to connect to a decentralised energy network in areas of major mixed use growth including town centres. The site conditions and constraints for each potential redevelopment scheme will undoubtedly differ and it is likely that not all sites could appropriately be connected to the decentralised network.</p>	The Core Strategy will be informed by a heat mapping exercise which is part of the Decentralised Energy Masterplanning initiative being led by the GLA. This will identify areas of opportunity for decentralised energy across the borough which can be prioritised in future. It will set out a route for implementation including costings which will inform viability.	None
242	45	Peter	Storey	Friern Village Residents Association	CS13 Efficient use of natural resources (formerly CS 12)	Not just additional development but assessments need to be made to existing areas with a view to improvement	Barnet is now an air quality management area and an action plan has been developed to improve air quality.	None
374	8			A2 Dominion Housing	CS13 Efficient use of natural resources (formerly CS 12)	<p>Preferred Policy CS 12 identifies that the LPA will seek to promote the highest environmental standards for development and continue working to deliver exemplary levels of sustainability throughout Barnet and will expect all developments to be energy efficient and seek to minimise any wasted heat or power.</p> <p>Whilst as a matter of principle, A2 Dominion encourage the provision of sustainable design and construction, however, these requirements should be balanced against the viability of the development. Explicit reference should be made in the policy so that viability is a specific factor which needs to be considered in determining the appropriate level of the use of natural resources</p>	Please see response to 241/10	None
379	20			Asda Stores Ltd	CS13 Efficient use of natural resources (formerly CS 12)	Development in the Borough should be required to meet the appropriate standards of sustainability and design. However policy should not necessarily prejudice development in high quality and historic areas, especially those in need for regeneration and where such development would have a positive effect on the location in which they are proposed in terms of economic, physical appearance and social inclusion.	The issue of heritage assets and climate change is addressed within PPS 5 on Planning for the Historic Environment (HE 1.2 and HE 1.3)	None
418	4	Julia	Hines	Age Concern	CS13 Efficient use of natural resources (formerly CS 12)	In considering the characteristics of a lifetime home, we would like to emphasise the importance of zero emissions homes, which will reduce fuel poverty as well as combating climate change. We believe that zero emission developments and the very highest levels of insulation and water saving technology should be part of policy. Homes should be built so that in the future older people will not have to choose between heating and eating.	The CS seeks to reduce carbon emissions from the housing stock and policy CS13 supports retrofitting the existing stock. More energy efficient dwellings should reduce energy consumption. We are targeting resources as part of our private sector decent homes programme.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 2 4	1	Mark	Mathews	Thames Water Property Services	CS13 Efficient use of natural resources (formerly CS 12)	<p>We welcome the sub-text to the policy which highlights the need to improve the Borough's water quality and acknowledges that water is a precious resource, putting an emphasis on water efficiency.</p> <p>We support the references to SUDs in new development in appropriate circumstances. However, it should also be stated that sustainable drainage systems are not appropriate for use in all areas, for example areas with high ground water levels or clay soils which do not allow free drainage.</p> <p>A well maintained and managed sustainable drainage system is also required to prevent it becoming ineffective, potentially increasing overland flows, and consequently having an impact on the sewerage network</p> <p>We support Policy CS12, particularly bullet point 5 which has an objective of making the Borough water efficient and minimise the potential for flooding. We consider that all new dwellings should meet the water usage targets set out in code for sustainable homes code 3 rating as a minimum.</p> <p>In relation to flooding, Water and sewerage undertakers have limited powers under the Water Industry Act to prevent connection ahead of infrastructure upgrades and sewer flooding can be caused when developers make connections to the existing sewerage network without proper consultation and authorisation from the relevant water company.</p>	<p>We welcome this support. Our SPD on Sustainable Design and Construction provides further detail on SUDs and emphasises the need for developers to consult Thames Water about sewer flooding. The SPD will be subject to revision in 2011.</p>	Publish draft LDS
4 2 9	8	Gaby	Kagan	Labour Group	CS13 Efficient use of natural resources (formerly CS 12)	<p>Policy CS12: a step-change in reducing carbon emissions in Barnet is required, and the council should be doing more to promote awareness of the issue and encourage residents, businesses and partners to reduce their own carbon footprints. The council must put robust strategies in place to reduce carbon emissions resulting from local authority operations, including Barnet Homes, and set similar expectation for other local organisations.</p>	<p>Further evidence is being developed to identify areas with the potential to deliver decentralised energy.</p>	None
4 3 3	1 0	Georgia	Wrighton	Women's Design Group	CS13 Efficient use of natural resources (formerly CS 12)	<p>"to promote efficient use of land and natural resources"- Again the BWDG support the principles of this objective, however, it does not go far enough to specifically require all development in the borough to consider good design and layout which ensures easy access by all modes, giving priority for the more sustainable modes and for those with special mobility requirements. Having these priorities underpinning design can deliver optimum use of the public realm, increase a sense of security and reduce barriers either real or perceived for access by all members of the community.</p> <p>All new major regeneration projects must benefit the Borough's diverse range of groups and have feelings of safety and community cohesion at their heart.</p>	<p>The Development Management Policies DPD will provide further detail on policy for access and design.</p>	None
4 3 6	1 1	Robert	Newton		CS13 Efficient use of natural resources (formerly CS 12)	<p>Reason: To rectify the deficiencies of the existing Sustainable Design and Construction Supplementary Planning Document.</p> <p>Re-write the first bullet point to read:"We acknowledge the weakness of our existing Sustainable Design and Construction Supplementary Planning Document and the poor contribution it makes to sustainability. We acknowledge the importance of sending a message to developers that only the highest standards will be accepted in the Borough and also of creating a level playing field for developers who wish to operate in the Borough.</p> <p>As a priority we will re-write the SD &amp; CSPD to include examples of best practice from across the country and to strengthen the provisions for householder developments as well as incorporating Policy 3.5, Table 3.3 and Paragraphs 3.26 to 3.33 of the London Plan Consultation Draft Replacement Plan (October 2009) with regard to the quality and design of housing and space standards."</p> <p>Amend the wording of Paragraphs 18.1.1 to 18.6.5 where necessary to reflect these changes to Policy CS12.</p>	<p>The Sustainable Design and Construction SPD is neither weak nor poor and will be updated to ensure that requirements reflect changes to generic environmental standards and recent advances in technology and design.</p> <p>We are supportive of the Mayors approach to the quality and design of housing including the housing density matrix and the new space standards in the draft London Plan. If the standards pass scrutiny and form part of the final London Plan they will replace the standards set out in the SPD on Sustainable Design and Construction.</p>	None
4 9	9	Zenda	Green	Mill Hill	CS13 Efficient	<p>Policy CS12- Ensuring the efficient use of natural resources (P90) This policy</p>	<p>We do recognise in the Core Strategy the</p>	Revise

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 4 2	9			British Library	CS13 Efficient use of natural resources (formerly CS 12)	The BL recognises the increasing pressures on the environment and as such support the principles of Policy CS12 which seeks to minimise Barnet's contribution to climate change. The BL is pleased to note that its comments to the Core Strategy Issues and Options version have been taken on board and that part 3 of Policy CS12 states: "We will expect all development to be energy-efficient and seek to minimise any wasted heat or power" The BL is pleased to note that the Council's priority is to utilise high quality design to ensure efficient use of energy rather than seek an inappropriate technological fix and/or renewable energy. The BL considers that the primary focus for new development should be on energy and resource efficiency, rather than renewable energy which may be difficult to deliver on smaller sites.	We welcome this support for our approach however the policy does not preclude the use of renewable energy.	None
4 4 6	1 6	Graham	Saunders	English Heritage	CS13 Efficient use of natural resources (formerly CS 12)	Support the need to efficiently use natural resources, and in particular the emphasis upon retrofitting existing housing stock, promoting high environmental standards, and introducing local networks to supply energy. However when developing these approaches we would advise that careful consideration is given to their application in sensitive areas such as conservation areas and listed buildings. It is still possible to introduce environmental measures that help improve energy efficiency, and reduce waste as long as the method of application is designed from an understanding of the significance of the heritage assets affected. In addition it should be noted that the appropriate re-use of existing historic buildings and where necessary re-use of fabric does help reduce the need for waste and utilises embodied energy. The policy and supporting text should make reference to the need to consider the character and heritage value of buildings and spaces where this policy will be applied.	We will provide a Development Management Policies DPD and policy framework for the sensitive consideration of these issues.	None
4 5 2	4	Lisa	Walduck	Natural England	CS13 Efficient use of natural resources (formerly CS 12)	The supporting text to this policy discusses the need for the Borough to adapt to climate change. However, the policy itself only appears to address flooding. There is also a need to address other impacts of climate change, including hotter, drier summers. Please see the attached paper on the natural value of green infrastructure, particularly the 'natural resilience' section. We recommend that either within this policy or within policy CS5 the effects of climate change and the need to adapt to these are addressed more fully.	We refer to the benefits that open space brings to combating climate change in the section on enhancing and protecting Barnet's open spaces	Revise supporting text to CS7

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 5 4	2	Katie	Arthur	Environment Agency	CS13 Efficient use of natural resources (formerly CS 12)	<p>We support Section 18 "Ensuring the efficient use of natural resources" and in particular Policy CS 12 which states a commitment to minimising the potential for fluvial and surface water flooding by ensuring development does not cause harm to the water environment, water quality and drainage systems.</p> <p>The policy also takes into account the requirements of several key documents including the London Plan and PPS25 and the North London Strategic Flood Risk Assessment. This includes a commitment to the application of the sequential test in determining site allocations and the use of Sustainable Drainage Systems (SUDS).</p> <p>Additionally, the document recognises the effects of climate change on flood risk.</p> <p>Suggested Improvements: The commitment to minimising flood risk should be extended to actively reducing flood risk through policy and development. This should include a commitment to reducing development surface water runoff and the use of SUDS, inline with the requirements of the London Plan.</p> <p>We would expect to see a mention of the reduction of flood risk in paragraph 18.1.2, under the list of issues that the Core Strategy can influence.</p> <p>In order to be considered comprehensive, paragraph 18.4.1 should included a commitment to choosing areas of lowest flood risk when considering site allocations.</p> <p>As previously mentioned, the Sequential Test should also be mentioned within this section of the Core Strategy. If the Sequential Test is not referred to in the Core Strategy we may find the document unsound at the submission stage.</p>	We welcome this support and have revised the policy to add reference to reducing surface water runoff from new development. The Direction of Travel made reference to the Sequential Test	Revise CS 13
4 5 4	3	Katie	Arthur	Environment Agency	CS13 Efficient use of natural resources (formerly CS 12)	<p>Policy CS12 does not make any mention of land as a resource to be managed or protected. Although I presume this will be addressed through the Site Allocations document, there should be a reference to contaminated land and site remediation in the Core Strategy.</p> <p>Although the deep chalk aquifer is protected by a layer of London clay, there are several gravel and similar permeable formations which may have their own minor aquifers. There are also several surface water rivers and streams that may require protection.</p> <p>Section 18.6.4 mentions the need to protect surface and groundwater from the effects of development but does not recognise the need to investigate and remediate the effects of historic land use. This should be mentioned within this section of the Core Strategy.</p>	We agree that contaminated land is an important resource and have made reference to it	Revise supporting text to CS13
4 5 9	1	HANA	KLEINER		CS13 Efficient use of natural resources (formerly CS 12)	<p>Regarding the statement that 75% of carbon emissions are generated by existing buildings the LDF should include urgent implementation of measures to reduce these. Household should be encouraged to improve insulation, to fit solar panels e.g. when new roofs are fitted. There should be confirmation that building regulations are to be observed. When extensions are made with regard to new developments, there is mention of building regulations both current and future, but no details of existing measures of enforcement. Does Barnet have an adequate staff and structure for the on site inspection of all building taking place? How many buildings are currently being inspected by qualified inspectors to conform with the existing building regulations,</p> <p>Not only visually but by physical measurements of energy loss as laid down in the building regulations. This issue will assume much greater importance in view of the extensive new developments planned.</p>	The Development Management Policies DPD will provide further policy on climate change. Part L of the Building Regulations 2000 controls proposed work to existing dwellings with regard to energy efficiency. Building Regulations are enforced through a combination of persuasion, formal letters and court action. Barnet has 14 qualified inspectors to enforce the Building Regulations and has sufficient staff to ensure conformity with the Regulations.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 6 6	4 1	A	Reid	Mount Anvil Plc	CS13 Efficient use of natural resources (formerly CS 12)	The phrase "the highest environmental standards" is not qualified.	Environmental standards are changing through the Building Regulations and the move to zero carbon dwellings. That is our benchmark.	None.
4 6 6	4 6	A	Reid	Mount Anvil Plc	CS13 Efficient use of natural resources (formerly CS 12)	Requiring Air Quality Assessments and Noise Impact Assessments from development will not necessarily do anything to improve air or noise quality. This statement should be qualified.	Such assessments contribute to the sustainable quality of development.	None
4 7 7	3 8	Andre w	Newby	Barnet Green Party	CS13 Efficient use of natural resources (formerly CS 12)	This clause is too late. The target should be to reduce Barnet's contribution to climate change, and to do so at a rate of at least 2.5 percent a year in order to match the government's overall target of an 80 percent reduction in greenhouse gas emissions by 2050	We are working through Barnet's LDF towards reducing greenhouse gas emissions and we consider that our approach is consistent with the London Plan and national policy on climate change	None
4 7 7	4 0	Andre w	Newby	Barnet Green Party	CS13 Efficient use of natural resources (formerly CS 12)	Barnet Council should support retro-fitting of the housing stock even if some people feels it impacts on the character or amenity of an area. Retro-fitting is vital if emission reduction targets are to be achieved and climate change is to be avoided. This is at least as important as ensuring that new buildings have low emissions. Impact is usually subjective in any case.	Impact is important given the priority we give to protecting and enhancing Barnet's character to create high quality places.	None
4 7 7	4 2	Andre w	Newby	Barnet Green Party	CS13 Efficient use of natural resources (formerly CS 12)	This is wishy-washy. The council should be taking steps itself as well as with partners	It is unrealistic to expect that the council has the resources to act alone on this.	None
4 7 7	4 7	Andre w	Newby	Barnet Green Party	CS13 Efficient use of natural resources (formerly CS 12)	The strategy pays too little attention to the impact of climate change. Reduction of greenhouse gas emissions should be a key target overall and should be given greater importance under various headings, as I have mentioned in those sections. The strategy should set a carbon reduction target of 2.5 percent a year to match the government's target of an 80 percent reduction in greenhouse gas emissions by 2050. More attention should be given to support for secondary community shopping areas, notably Hendon, Temple Fortune, Golders Green and East Finchley. The extension of Brent Cross shopping centre should be barred.	We refer to our answer at 477/38. The Core Strategy supports the 20 town centres in Barnet. Brent Cross is London's only regional shopping centre and an area of strategic importance. Its regeneration is highlighted in the London Plan.	None
4 7 8	3 4	Steve n	Deller		CS13 Efficient use of natural resources (formerly CS 12)	All new developments to include solar panels and windmills for self generating electricity	We will not seek an inappropriate technology fix when high quality design can ensure more efficient use of energy.	None
4 7 8	3 7	Steve n	Deller		CS13 Efficient use of natural resources (formerly CS 12)	The Claremont stadium plans were proved to increase the risk of flooding but you ignored this	This a specific matter connected with planning consent for Hendon FC.	None
4 7 8	3 8	Steve n	Deller		CS13 Efficient use of natural resources (formerly CS 12)	Cricklewood is already one of the most polluted parts of the borough. You intend to make this worse with your development. Further increasing pollution in Cricklewood	These issues were considered as part of the Brent Cross – Cricklewood planning application which the council resolved to approve subject to S106 in November 2009.	None
4 8 3	4 0	Maria	Nash	Barnet Women's Design Group	CS13 Efficient use of natural resources (formerly CS 12)	All stakeholders and local residents in particular Barnet's Women's Design Group, LA21 groups, disabled groups, elderly groups should be involved. Have Barnet wide environmental workshops in community centres or schools to train/give information to all people who work or live in Barnet as to how they could make this possible.	As part of our Future Shape programme we are developing a new relationship with citizens and encouraging self help and behaviour change. It is about empowering residents to help one another to access information rather than the council simply running a series of workshops.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

488	52	Glen	Rollings	Greater London Authority	CS13 Efficient use of natural resources (formerly CS 12)	The draft replacement London Plan revises the target for renewable energy provision and the document should be updated to reflect these changes.	Agree to add reference to Table 5.1 in Draft Revised London Plan	Revise supporting text to CS13
439	10	Zenda	Green	Mill Hill Preservation Society	CS14 Dealing with our waste (formerly CS13)	Policy CS13- Dealing with our waste (P92) We support the protection of the environment by reducing amounts of waste and increasing recycling. Within the Mill Hill East development, the high density of flats and houses and their close proximity to one another and lack of space will create a situation where, if the current waste process is applied, the streets will be lined with a plethora of refuse bins, green waste bins and recycling boxes. We feel that this needs to be addressed with new waste practices within the LDF.	This is not a matter for the LDF to address. Our household waste storage facilities are sensible and practical. They are designed to provide adequate capacity and divert materials going to landfill.	None
464	20	David	Howard	Federation of Residents Associations in Barnet (FORAB)	CS14 Dealing with our waste (formerly CS13)	We are concerned at the approach being taken by the Borough as a member of the NLWA through the NLWP for managing waste disposal. Although not a key element of the current document we have grave reservations as to whether there is joined up thinking between the LDF and the waste exercise which will finish up as part of the LDF library of documents	The NLWP is more than a waste exercise. It involves working with six other north London boroughs to identify sites and policies to manage all waste produced in north London over the plan period. A considerable amount of consultation has been carried out to date with the preferred options published in November 2009. This document highlighted the links with boroughs Core Strategies and the policy framework for dealing with applications for waste management facilities.	None
467	47	Pauline	McKinnell	Cricklewood Community Forum	CS14 Dealing with our waste (formerly CS13)	Not sure a waste management facility fits in with Brent Cross Cricklewood regeneration plan. It may have to be relocated elsewhere.	The emerging North London Waste Plan will identify waste sites. London Plan policy requires the replacement of existing waste sites so the Hendon transfer facility needs to be replaced.	None
469	0	Malcolm	Carter	Bestway (holdings) Ltd	CS14 Dealing with our waste (formerly CS13)	<p>ii) There is no evidence behind the reasoning of the Council's policy that a waste management facility must be safeguarded within the BXC Regeneration Area. The site selection process for waste facilities within Barnet should follow the proposed sequential test within the NLWP. The NLWP Preferred Options does not state that a waste facility must be retained within the BXC Regeneration Area and if the apportionment targets within the NLWP can be met by more suitable sites outside of the Regeneration Area (e.g. the identified site at Pinkham Way), there would be no Requirement for a waste facility within the Regeneration Area. This part of the policy does not sit fully with the NLWP Preferred Options policies and should consequently be removed from Policy CS13.</p> <p>ii) We also object to the part of CS13 which safeguards a Waste Management Facility in the Brent Cross – Cricklewood (BXC) Regeneration Area and believe this element of the policy should be removed from Policy CS13. As stated above, we agree that waste management sites should be designated through the NLWP when it is adopted. However, the NLWP Preferred Options does not state that there must be a waste management facility within the BXC Regeneration Area and we consider there are more suitable waste management sites within the wider NLWP boundary (outside of the Regeneration Area) than our client's site within the Regeneration Area.</p>	<p>Safeguarding a waste management facility ensures conformity with the London Plan with regards to replacement of existing facilities.</p> <p>The site at Geron Way has been identified as a preferred site for waste management in the NLWP. We clearly state that a waste management facility forms part of the proposals for Brent Cross - Cricklewood as set out in the outline application and the development framework.</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 6 9	1	Malcolm	Carter	Bestway (holdings) Ltd	CS14 Dealing with our waste (formerly CS13)	<p>i) There was no site selection process or evidence provided within the BXC planning application as to why our client's site has been selected for waste management use and there was no evidence behind whether this was the most suitable site within the BXC Regeneration Area or the wider area of the NLWP. The BXC application refers to the fact the site is identified as a Schedule C site within the NLWP Preferred Options document and this document currently gives a high score for the suitability of our client's site for waste management use. However, it is premature to rely on the NLWP Preferred Options document for future waste management sites and we submitted representations to the NLWP Preferred Options</p> <p>Highlighting that the scoring system within this document is flawed and inconsistent between sites.</p> <p>The NLWP document has not undergone an Examination in Public and has not been adopted. Until this time, limited weight should be attached to the sites identified within the current NLWP Preferred Options document. The scoring for sites within the NLWP Preferred Options document could be subject to change by the time the document is formally adopted and/or the document could be found to be 'unsound'.</p> <p>Consequently, limited weight should be provided to the suitability of sites identified within this document until it is formally adopted.</p> <p>We propose the following changes to Policy CS13 – Dealing with our Waste.</p> <p>i) The policy states that waste management sites will be designated through the NLWP and these sites will be the principle locations considered suitable for waste facilities.</p>	<p>The NLWP is part of the LDF and informs and is informed by the Core Strategy.</p> <p>The Geron Way site forms part of the proposals for Brent Cross - Cricklewood as set out in the outline application and the Development Framework.</p>	None
4 6 9	2	Malcolm	Carter	Bestway (holdings) Ltd	CS14 Dealing with our waste (formerly CS13)	<p>We agree that the NLWP should be used to identify suitable sites for waste management facilities. However, consultation on the NLWP Preferred Options has only just ended (10 January 2010) and until this document is formally adopted and considered sound by an Inspector, limited weight should be attached to the sites designated within this document. It would be premature for the Council to rely on any sites designated as suitable for waste facilities within this document until it is formally adopted.</p> <p>Notwithstanding the above, we consider the scoring system within the NLWP Preferred Options to be flawed and inconsistent between different sites (we have made similar comments in Bestway's consultation response to the NLWP Preferred Options). This is discussed under question (5) below.</p>	We refer to our response at 469/1	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 6 9	3	Malcolm	Carter	Bestway (holdings) Ltd	CS14 Dealing with our waste (formerly CS13)	<p>iii) Policy CS13 relies upon designated sites within the NLWP. The sequential approach should be included within Policy CS13 for the location of future waste development in line with the emerging NLWP Preferred Options policy NLWP1. This would ensure that existing waste treatment sites and waste transfer sites are assessed for their suitability for waste facilities before other sites are considered. This would also comply with Policies 4A.24 and 4A.27 of the London Plan.</p> <p>In the BXC application that the Council has recently resolved to grant permission for, our client's site was identified for a waste handling facility without evidence as to the suitability of the site and without a sequential assessment being undertaken. The BXC application is therefore not compliant with the emerging NLWP policy and the Core Strategy should ensure that future waste development is fully assessed in line with the emerging policy.</p> <p>iii) The sequential approach should be included within Policy CS13 for the location of future waste development in line with national waste policy, the London Plan, and the emerging NLWP Preferred Options policy NLWP1. Policy NLWP1 advocates that in assessing proposals for waste management facilities, North London Boroughs will require that the developers have first considered existing waste treatment sites (Schedule A), followed by existing waste transfer sites (Schedule B), before even considering the possibility of proposed new sites for waste management use (Schedule C – our client's site falls within this category).</p>	<p>The NLWP is the appropriate place for the sequential policy as it forms part of the LDF. There is no need for duplication. The Core Strategy highlights the role of the NLWP in designating new sites but this does not obscure the identification of a waste management facility in Brent Cross Cricklewood as part of the proposals for that area. It is recognised that NLWP is an emerging document whose timetable is behind that of Barnet's Core Strategy.</p>	None
4 8 3	4 7	Maria	Nash	Barnet Women's Design Group	CS14 Dealing with our waste (formerly CS13)	<p>Only if local people who work or live in Brent Cross - Cricklewood area agree with proposals There should be workshops around Barnet to educate the residents and businesses</p>	<p>This issue was addressed within the Brent Cross planning application. The North London Waste Plan provides the opportunity to comment on proposed waste sites. Consultation on this document included a drop in consultation event at Hendon Town Hall which was open to all residents and was publicised locally. This was attended by both planning officers and waste officers who were available to answer any questions that people had on waste matters from doorstep recycling to possible new waste sites.</p>	None
4 8 7	4 1	Michael	Storey		CS14 Dealing with our waste (formerly CS13)	<p>Except for point c) which depends on where they are, and point d) which needs further consultation?</p>	<p>In line with the London Plan existing sites in waste use must be safeguarded and equivalent replacement provided if they are to be developed. This is the case in the Brent Cross Cricklewood regeneration area. New sites for waste management are required to meet the growth in waste projected across north London; their location is dependent on a series of assessment site criteria that are set out in the emerging North London Waste Plan.</p>	None
4 8 8	5 3	Glen	Rollings	Greater London Authority	CS14 Dealing with our waste (formerly CS13)	<p>Transport accessibility and minimising the impact of waste and construction materials on the highway network should be central to the council's waste strategy. TFL would like to see the inclusion of additional text under Policy CS13 to read that "the council will promote sustainable transfer of waste by non vehicular modes using multimodal and modern technologies. In particular vehicular trips will be minimised outside of peak hours particularly in sensitive locations".</p>	<p>This is a matter for the emerging North London Waste Plan which sets the policy framework for waste management.</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

2 4 1	1 1	Ian	Dubber	Workspace Group PLC	CS15 Delivering the Core Strategy (formerly CS14)	Workspace considers that a balanced approach should be taken when considering the value of the overall planning obligations package, thereby ensuring the viability and deliverability of the proposed development to meet strategic objectives. As such, Workspace considers that any S106 contributions should be applied on a site by site basis and adheres to the requirements of Circular 05/2005. Planning obligations must only be imposed when it can be demonstrated that they are needed to mitigate against the impact of the development.	Agreed that planning obligations should be required in line with Circular 05/2005 or its replacement	None
4 1 8	1 3	Julia	Hines	Age Concern	CS15 Delivering the Core Strategy (formerly CS14)	We are not convinced that section 106 payments should be used to fund a Business Links officer as we are not convinced that this is the best use of s.106 funding. Local business is not defined – is it a business with a registered office within the borough, or where a proportion or a majority of employees live within the borough? The post appears to be unduly focussed on construction.	The Business Links Officer will help the council to: - understand more about the experience of local businesses in the current economic climate (particularly businesses located in the borough's town centres) - support local small and medium-sized enterprises and enable them to be more aware of, and bid for, contracts from local developers - act as a conduit for support and advice - understand the skills needs of local businesses - encourage links between business and education - support contractors in the preparation and implementation of their Local Procurement Strategy documents, which will act as a frame of reference for the resulting partnership between the Council, developers and local businesses.	None
4 1 8	1 4	Julia	Hines	Age Concern	CS15 Delivering the Core Strategy (formerly CS14)	We are concerned about the emphasis on worklessness amongst younger people and NEETs. Whilst we acknowledge this is an important social issue, we would like to highlight the issue of unemployment, particularly following redundancy, on older people of working age. Older people are more expensive to employ and so more vulnerable to being made redundant in an economic downturn. They have less chance of finding new work than any other age group. Being out of work at the end of your career can result in a failure to build up adequate pension provision, leading to long term poverty following retirement and significant social costs for the community.	A Skills Development Plan (currently under review) is being delivered in the borough through the Council and its partners. The Plan includes actions to respond to the recession which are age neutral (for example partner provision such as Barnet College's 'response to redundancy'). A particular target is those who have been out of work for 6 months or more. From April 2010 people aged 50 and over on Jobseeker's Allowance have benefited from early access to training provision through Jobcentre Plus that would not normally be available until the six month stage of their claim.	None
4 1 8	2 2	Julia	Hines	Age Concern	CS15 Delivering the Core Strategy (formerly CS14)	We disagree with this policy and believe climate change should be the overriding principle in all new developments, because older people are more vulnerable to its impact than any other sector of the population. Barnet's record on CO2 emissions is currently very poor compared with other boroughs in London.	We are working through Barnet's LDF towards reducing greenhouse gas emissions and we consider that our approach is consistent with the London Plan and national policy on climate change	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 2 4	2	Mark	Mathews	Thames Water Property Services	CS15 Delivering the Core Strategy (formerly CS14)	<p>We support the references within this section to infrastructure and the requirement that infrastructure is in place to meet the requirements of the Borough. It is important that infrastructure is brought forward in a timely manner to meet the demands placed upon it by new development. It is also essential that developers demonstrate that adequate capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water &amp; sewerage infrastructure.</p> <p>Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water authority to agree what improvements are required and how they will be funded prior to any occupation of the development.</p> <p>Therefore we suggest bullet point 1 of Policy CS14 is amended to state that :-          'Work with relevant providers and developers to ensure that necessary infrastructure is secured and delivered in time to support Barnet's growth.....'          In relation to Bullet Point 2 of Policy CS14 it is our understanding that Section 106 Agreements can not be used to secure water and waste water infrastructure upgrades.</p> <p>As Water and sewerage undertakers also have limited powers under the Water Industry act to prevent connection ahead of infrastructure upgrades we therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing or the use of Grampian style conditions.</p>	<p>We would welcome Thames Waters contribution to our Infrastructure Delivery Plan. We consider that the policy wording is clear that infrastructure is secured to support growth. The where, when, what and how is set out in the Infrastructure Delivery Plan.</p>	Publish Infrastructure Delivery Plan
4 3 3	1 2	Georgia	Wrighton	Women's Design Group	CS15 Delivering the Core Strategy (formerly CS14)	<p>Social infrastructure like affordable child care, health, community and education facilities must improve and keep up with the pace of proposed development to ensure that inequalities are not deepened. The Council should consider enabling the provision of a 'Centre for Independent Living' in the Borough.</p>	<p>Social infrastructure forms a key part of our Infrastructure Delivery Plan as does the proposal for the Centre for Independent Living</p>	Publish Infrastructure Delivery Plan
4 3 6	1 2	Robert	Newton		CS15 Delivering the Core Strategy (formerly CS14)	<p>Reason: To ensure that development is not completed in advance of infrastructure provision, that development accords with planning policy and planning consents and that elected Members have an overview and control over the implementation of planning policy and its review.</p> <p>Add the following bullet points:          We will: "Recognise that developments will have to be delayed, deferred or halted if the necessary infrastructure is not provided or delayed."          "Ensure that there is adequate provision for monitoring development work and planning enforcement in the Borough and that within the statutory constraints there is a clear message that infringements will be pursued by the Council."          "Ensure there is Council Member review of planning decisions in accordance with the July 2005 Audit Commission report so as to check that development proceeds in accordance with the Core Strategy and related policies and that remedial action is taken when this is not the case."          Amend the wording of Paragraphs 20.1.1 to 20.10.2 where necessary to reflect these changes to Policy CS14.</p>	<p>Each policy in the Core Strategy will be monitored based on specific indicators and reported in the Annual Monitoring Report. This will provide clear evidence of policy delivery and a basis for review of the Core Strategy</p>	Addition of monitoring indicators in Appendix B.
4 3 9	1 1	Zenda	Green	Mill Hill Preservation Society	CS15 Delivering the Core Strategy (formerly CS14)	<p>Delivering the Core Strategy (P97) should use planning obligations to both improve existing infrastructures (including green infrastructure) along with securing new infrastructure for development. In addition section 20.5.3 (P95) funding priorities from S106 development gain should seek to fund both provision of new open spaces and the improvement of existing spaces.</p>	<p>The priorities for S106 are clearly set out in the Core Strategy. In increasing access to open space we aim to improve the quality as well as the quantity. Therefore it is important to highlight improvements to open space as a S106 priority.</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

442	10			British Library	CS15 Delivering the Core Strategy (formerly CS14)	The BL is please to note that the Council will use planning obligations in appropriate circumstances in accordance with Circular 05/05. The BL recognise that further guidance on the Council's approach to planning obligations is set out in the Interim Guidance Note on Section 106 which has been brought forward in response to the current economic circumstances.	We welcome this support	None
443	11			Metropolitan Police Authority	CS15 Delivering the Core Strategy (formerly CS14)	Part 20.5 of this section deals with Planning Obligations. A list of proposed items for which planning obligations will be sought is outlined in section 20.5.3. The MPA are aware that significant additional development is likely to come forward in the borough which may increase demands on community facilities such as police facilities. Policy 3A.18 of the London Plan states that policies in DPD's should assess the need for social infrastructure and community facilities (including police facilities) in their area, and ensure that they are capable of being met wherever possible. Recommendation: In order to ensure the Core Strategy complies with the statutory development plan policy it is requested that an additional point is added to the list within section 20.5.3 to include - policing	The Core Strategy recognises that the Metropolitan Police provides community services and facilities. The Infrastructure Delivery Plan set out the provision for infrastructure.	None
443	12			Metropolitan Police Authority	CS15 Delivering the Core Strategy (formerly CS14)	Section 20.6 deals with the Community Infrastructure Levy. As a provider of community facilities the MPA are concerned about the blanket use of Community Infrastructure Levy (CIL) model for predicting future police floorspace requirements. Levies tend not to take into account the many factors which affect policing infrastructure need. A variety of pressures impact upon the level of policing required within the borough. Several issues such as demographics and socio-economic factors and significantly different levels of police officers are needed across the 32 boroughs according t a variety of different factors; the ratio of police officers to population differs greatly between the highest police provision and the lowest within each borough. The MPA are continually monitoring their needs in the Barnet and across London and they wish to have the flexibility to respond to policing needs if and when they arise. It is believed that the formula based approach is too simplistic and doesn't reflect the MPA's estate strategy. The best way to ensure the delivery of the aims of the Barnet Asset Management Plan is to influence planning policy and development proposals and to secure the delivery of floorspace and other obligations through S106 agreements. This has proven to be the most successful way of delivering the MPA's estate needs and providing police facilities where they are needed. Recommendation: The MPA recommend that the traditional S106 route for the provision for policing should remain alongside any introduction of CIL. Therefore the following alteration is recommended to section 6.2.1 - 'Negotiated planning obligations will still be possible for site specific issues such as policing and to allow for affordable housing to be delivered on site.	We refer to our previous answer at 443/11 on S106. There is still uncertainty about the implementation of CIL. If it does proceed the Metropolitan Police will have the opportunity to contribute to Barnet's charging schedule.	None
445	3	Joanne	Woodward	London Borough of Enfield	CS15 Delivering the Core Strategy (formerly CS14)	It is acknowledged that some work has already been commenced regarding infrastructure provision as part of the AAP/ master plan preparation for the major regenerations areas and that Policy CS 14 - Delivering the Core Strategy refers to an Infrastructure Delivery Plan. It is hoped the work already done on the major regeneration areas plus the work to be done to produce the Infrastructure Delivery Plan will be pulled together to ensure services are supplied to the proposed increased population as housing is developed.	The Infrastructure Delivery Plan incorporates work on the three major regeneration and development areas.	Publish Infrastructure Delivery Plan

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

445	5	Joanne	Woodward	London Borough of Enfield	CS15 Delivering the Core Strategy (formerly CS14)	The Council is please to see a reference to working with neighbouring boroughs in Section 20.9 and Policy CS 14 – Delivering the Core Strategy. The particular reference to Enfield's North Circular AAP is also welcomed. LB Enfield looks forward to continue working with LB Barnet (and LB Haringey) regarding the North Circular AAP which includes the master planning at New Southgate and the works to New Southgate Station.	We welcome this support and look forward to continuing to work with Enfield on the AAP and the SPD for New Southgate.	None
446	17	Graham	Saunders	English Heritage	CS15 Delivering the Core Strategy (formerly CS14)	It is important to highlight the historic environment as a S106 priority. Many development proposals can have an adverse impact upon the historic environment in terms of affect the character of a conservation area or undermine the setting of a listed building. We would therefore seek to ensure that S106 monies negotiated also recognise the need for the historic environment to be appropriately compensated. Identifying the historic environment as a priority under paragraph 20.5.3 helps ensure that monies obtained are directed appropriately to those assets of the Borough affected.	We consider that these are issues that should be resolved through sensitive design rather than resort to the S106 route and put further strain on resources for infrastructure.	None
453	3			Her Majesty's Court Service (HMCS).	CS15 Delivering the Core Strategy (formerly CS14)	We support the need to work with relevant providers to ensure that necessary infrastructure is secured to support growth, and the use of planning obligations to secure such infrastructure. Barnet's s106 priorities are listed at Paragraph 20.5.3 on page 95. We request that court facilities are included within this list, because population and economic growth places additional pressure on a range of court services; directly requiring existing services to be enhanced or extended. It is appropriate therefore that the cost of such additional requirements is met by development in the Borough, in exactly the same way as other community services are supported.	We consider that by ensuring that developments incorporate design principles which contribute to community safety and security we can address this issue at an early stage and prevent crime. There is therefore no need to highlight as a S106 priority. We would welcome the involvement of HMCS in Barnet's Infrastructure Delivery Plan.	None
455	34	Mike	Dawson	Finchley Society	CS15 Delivering the Core Strategy (formerly CS14)	This policy should be amended as below: We will work with Barnet's Local Strategic Partnership and other partners to deliver the vision, objectives and policies of this Core Strategy. We will: • work with relevant providers to ensure that necessary infrastructure is secured and provide the facilities needed for the borough's communities to support Barnet's growth. Information on the key infrastructure schemes in Barnet up to 2026 are set out in the Core Strategy Infrastructure Delivery Plan	Unclear on the benefit of this change. The Infrastructure Delivery Plan is required to support growth. Securing community support for growth is a wider matter and a key part of the localism agenda	Publish Infrastructure Delivery Plan
464	14	David	Howard	Federation of Residents Associations in Barnet (FORAB)	CS15 Delivering the Core Strategy (formerly CS14)	Please ensure there is adequate investment in infrastructure such as public transport doctors' and dentists' surgeries and utility provision before approving new development. Stop the issuing of on-street parking permits to occupiers of new developments. Large numbers of flats are being built with insufficient car parking leading to further congestion on the streets. The water, electrical gas and sewerage installations are constantly failing in various parts of the Borough and there are forever new holes appearing as another section of a utility is repaired or renewed. Growth on the scale envisaged requires more and faster investment.	In line with national planning policy guidance an infrastructure delivery plan will be produced which will provide detail on what infrastructure will be provided and where. The Core Strategy supports a parking regime that balances reducing car use while recognising that many residents continue to travel by car. The Development Management policies DPD will provide more detail on car parking standards and policies for Barnet. The approach to the issuing of parking permits for new development reflects the strategy and that was agreed by Cabinet in 2004.	Publish Infrastructure Delivery Plan
470	13			Government Office for London	CS15 Delivering the Core Strategy (formerly CS14)	Monitoring mechanisms should be included in the publication version of the Strategy. This is most usefully set out in a single table in the annex. Where possible the monitoring mechanisms should be linked to contingency options, particularly for the Core Strategy's critical issues.	Agree	Addition of monitoring indicators in Appendix B.

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

471	6	David	Howard	New Barnet Community Association	CS15 Delivering the Core Strategy (formerly CS14)	Para 2.4.3 refer to the Infrastructure delivery plan. This is a key element to the success of any programme of growth. It is not available therefore work on expansion should not be permitted until the infrastructure issues are addressed	We consider that the policy wording is clear that infrastructure is secured to support growth. The where, when, what and how is set out in the Infrastructure Delivery Plan. The Infrastructure Delivery Plan will be published alongside the Publication Version of the Core Strategy.	Publish Infrastructure Delivery Plan
472	3	Jan	Chairman	NHS Barnet	CS15 Delivering the Core Strategy (formerly CS14)	We also support reference to the preparation of Barnet's Infrastructure Delivery Plan in emerging evidence base documents set out in paragraph 4.13, and would encourage thorough discussion with the PCT to ensure healthcare provision is appropriately planned.	We welcome this support and the input of the NHS and other strategic partners to the development of the Infrastructure Delivery Plan.	None
472	9	Jan	Chairman	NHS Barnet	CS15 Delivering the Core Strategy (formerly CS14)	Whilst section 20.10 is welcomed, as it confirms the Council's commitment to monitoring the impacts of the policies, to confirm if the Core Strategy and SCS objectives are being met, the Direction of Travel consultation document does not include any suggested indicators. We would urge the Council to include a comprehensive set of health and well being indicators, to help to confirm whether health and well being is improving. Examples could include whether identified health issues are being tackled (e.g. levels of cardio vascular disease), if healthy lifestyles are being adopted, if people have access to open space and are taking part in physical activities and if people have adequate access to facilities.	Each policy in the Core Strategy will be monitored based on specific indicators and reported in the Annual Monitoring Report. This will provide clear evidence of policy delivery and a basis for review of the Core Strategy	Addition of monitoring indicators in Appendix B.
483	48	Maria	Nash	Barnet Women's Design Group	CS15 Delivering the Core Strategy (formerly CS14)	More local groups should be involved and not only the usual stakeholders & LSP which is not local enough to monitor the Core Strategy. As the Core Strategy should be a living document to enable laws and environment issues like climate change to meet these changes then local people should have a voice and monitoring abilities through LA21 groups	See response at 472/9	Addition of monitoring indicators in Appendix B.
487	42	Michael	Storey		CS15 Delivering the Core Strategy (formerly CS14)	Section 106 money should be spent on the community where the development is, to help soften the impact of a new development. Please remember that Section 106 money is not the be-all and end-all of your aims.	Section 106 money is one source of funding for the critical infrastructure required to growth.	None
488	54	Glen	Rollings	Greater London Authority	CS15 Delivering the Core Strategy (formerly CS14)	TFL wishes to see a reference to working with 'Transport for London' under section 20.2.	Agree	Revise supporting text to CS 15
488	55	Glen	Rollings	Greater London Authority	CS15 Delivering the Core Strategy (formerly CS14)	TFL would like to see the inclusion of additional text under paragraph 20.4 to state "developers will be expected to fund necessary and relevant transport infrastructure improvements to support development"	We clearly highlight our S106 priorities for transport at 20.5.3	None
488	56	Glen	Rollings	Greater London Authority	CS15 Delivering the Core Strategy (formerly CS14)	TFL would like to see the inclusion of additional text under paragraph 20.5.2 to state that "planning obligations can help to make development acceptable as well as successful and sustainable".	Agree	Revise supporting text to CS 15
488	57	Glen	Rollings	Greater London Authority	CS15 Delivering the Core Strategy (formerly CS14)	At paragraph 20.5.3, the bullet point "improvements to public transport infrastructure and system" has been written twice.	Agree	Revise supporting text to CS 15
488	58	Glen	Rollings	Greater London Authority	CS15 Delivering the Core Strategy (formerly CS14)	TFL would like to see the inclusion of additional text under paragraph 20.5.3 to state that "the priorities for s106 funding will be transport and affordable housing", as stated in the London Plan.	Our Core Strategy reflects the S106 priorities for Barnet.	None
488	59	Glen	Rollings	Greater London Authority	CS15 Delivering the Core Strategy (formerly CS14)	TFL welcomes the reference to pooled contributions at paragraph 20.5.4.	We welcome this support	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

488	60	Glen	Rollings	Greater London Authority	CS15 Delivering the Core Strategy (formerly CS14)	Where development over TFL land is proposed or where there are significant transport implications TFL will expect to be party to a Section 106 agreement (paragraph 20.5.5).	TFL would by definition be heavily involved in the application process and negotiations for the sort of developments mentioned. This is not considered a necessary addition to the Core Strategy.	None
488	61	Glen	Rollings	Greater London Authority	CS15 Delivering the Core Strategy (formerly CS14)	TFL would welcome reference to its Guidance on residential travel planning in London and Guidance for workplace travel planning for development and the travel plan thresholds detailed within them in this section of the Core Strategy. This is required under Policy 3C.2 of the London Plan.	This is not considered a necessary addition to the Core Strategy and is better addressed in our emerging Development Management Policies DPD	None
	1	Emma	Ford	London Fire and Emergency Planning Authority	CS15 Delivering the Core Strategy (formerly CS14)	<p>The LFB wish to see the inclusion of emergency services as a key priority for S106 contributions in paragraph 20.5.3. It is vital to assist the LFB in continuing to provide a fast effective and resilient emergency response, which can be achieved through financial contributions towards improving and expanding current fire stations facilities and services.</p> <p>Unless opportunities are taken to build safety into any new infrastructure, future growth within Barnet could create additional risks from fire and other emergencies across the borough. The LFB urges the council to ensure that future policies specifically identify the links between future development proposals and by new developments in Barnet to designing out risks from fire, particularly in residential accommodation. This would include giving consideration to installing hard wired smoke alarms in social housing and sprinkler systems where the risks justify it. Efforts to try and reduce crime such as arson through good design should also be promoted.</p> <p>In addition, the LFB Fire Safety Regulation Team request to work closely with architects and Barnet's housing department, planning department and building control officers to address this issue at an early stage. The LFB believe that the capacity of the key emergency services to improve community safety and maintain a speed of emergency response in line with standards the LFB have set (see London Safety Plan 2009/2012 at <a href="http://www.london-fire.gov.uk">www.london-fire.gov.uk</a>) is one issue which should take into account when negotiating Section 106 agreements. This plan should also be taken into account in Section 17 of the plan ('Making Barnet a Safer Place') in order to reduce crime and disorder. As part of the Safety Plan, the LFB undertakes a number of initiatives including working with the Junior Citizen scheme to help young people learn valuable personal safety life skills and in 2009, over 2,500 children from across Barnet attended Junior Citizen events.</p> <p>In the future the LFB request that Barnet work with the LFB to ensure resilient emergency response by improving appropriate financial contributions towards improving and expanding current fire stations facilities and services. The LFB support the negotiation of section 106 planning obligations, or Community Infrastructure Levy if this is brought in as a replacement system, and request the emergency services are always taken into account.</p>	Fire safety is an issue for Building Control. We consider that by ensuring that developments incorporate design principles which contribute to community safety and security we can address this issue at an early stage and reduce the burden on the emergency services. There is therefore no need to highlight as a S106 priority.	None
238	1	Jonathan	Cornelius	TFL Corporate Finance Property Development	General	<p>Overall, TFL CFPD supports the principles set out in the Core Strategy Direction of Travel, in particular paragraph 8.2.2 which encourages housing or mixed development within or on the periphery of Barnet's town centres. To help support this aim, TFL CFPD wish to promote a number of sites for residential or mixed use, they are:</p> <p>Colindale Station Car Park, East Finchley Station Car Park, Finchley Central Station Car Park, High Barnet Station Car Park, Mill Hill East Station Car Park, Totteridge and Whetstone Station Car Park, Woodside Station Car Park, Site south of Nether Street.</p>	These sites will be considered as part of the Site Allocations DPD.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

2 4 4	1	Peter	Hewitt		General	<p>There is a daunting and quite often much arcane detail in Barnet's planning document 'Direction of Travel'. It is my belief that all but the most directly affected residents will have had neither the time, opportunity nor inclination to study the formidable assortment of documents/tables/plans/policy statements that compromise the LDF dossier. Even the clichéd business jargon of its title is enough to deter the ordinary man-in-the-street. I myself have to admit therefore to having confined my study of it to S.8, S.10 and S14 - for it is these three categories of the so called. Core Strategy Planning that my suburb of the borough is pre-eminently concerned with. Indeed, as has been so vehemently articulated during the past several years by the 'Save New Barnet Campaign Members' - apropos JCoSS, Tesco and ASDA.</p>	<p>A good Core Strategy is written in language that people can understand. It is important that the Core Strategy is clear and concise so that developers, the community, the council and its partners understand how the area will be changing, when it will change and what their role is. We consider that our priorities for Barnet over the next 15 years avoid the use of jargon wherever possible. Consultation on the Direction of Travel included meetings and presentations to a wide variety of groups and stakeholders explaining what we were doing, why we were doing it and how they could get involved.</p>	None
3 7 9	1			Asda Stores Ltd	General	<p>ASDA Stores Ltd is proposing the comprehensive regeneration of East Barnet Gas works, to the north of Albert Road, New Barnet for mixed use development. In a prominent location to the north of the town centre the site offers an opportunity for landmark development, able to underpin and enhance the vitality and viability of the New Barnet town centre. An application was submitted in January 2009 proposing the development of the site for mixed use development to comprise residential and retail uses. The proposal sought to remediate the site to enable a contemporary mixed use development that would significantly contribute towards the regeneration of New Barnet. Whilst the application was subsequently withdrawn it was acknowledged that the proposal would regenerate the site and the wider area.</p> <p>National Planning policy promotes sustainability, central to which is the need for the effective use of previously developed sites. Policy encourages investment in previously developed sites that strengthens existing centres and provides a mix of uses that promotes social inclusion.</p> <p>The site represents the principle development opportunity in New Barnet and if it is to be brought back into active use there is a need for significant remediation works. Given the onerous cost of bringing the site forward development on the site needs to generate sufficient value to ensure the deliverability of any future proposal. In this context Barnet Council should seek to plan positively for the development of the site. If no viable solution is planned for the site will continue to blight the area. Detailed local policy promotes both housing and retail development on the Gas Works site and the Council makes clear their intention to support development of a suitable scale and function on the site that will further enhance the adjacent New Barnet town centre.</p> <p>In recent years New Barnet town centre has been in decline. It is important that the Council provide a planning framework that seeks to promote the opportunity at the Gas Work site presents to revitalise the wider centre. Further to our submission to the Core Strategy Issues and Options we welcome additions to the text that support the need to prioritise the development of previously developed Brownfield land and recognise the importance of retail development. We also support promotion of retail and mixed use development in existing centres. The development of Brownfield sites provides important opportunity for the Council to achieve their goal of strengthening and enhancing Barnet's role as a competitive Borough which offers its inhabitants a high quality environment in which to live, work and play in.</p>	<p>In order to ensure that known development opportunities within and on the edge of the town centre are managed in the right way a Town Centre Framework for New Barnet has been developed to provide a strategy for development in consultation with the community.</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 1 3	1	Sarah Burgess	CABE	General	<p>Unfortunately, due to limited resources, we are unable to comment on this document. However we would like to make some general comments which you should consider.</p> <p>A good spatial plan is essential to achieving high quality places and good design. CABE believes that getting the local development framework core strategies right is one of the most important tasks planners are undertaking. We have run workshops with over 65 local planning authorities to look at how well design is being embedded in core strategy documents, which form part of the local development framework. The workshops offer local authorities independent informal advice from an expert panel and allowed us to identify the strengths and weaknesses of current approaches to spatial planning and how design, functionality and space are dealt with in core strategy documents.</p> <p>Three key messages for local planning authorities have emerged from our workshops. These are now embedded within a CABE publication called Planning for places: delivering good</p> <p>This publication is available to download from the CABE website <a href="http://www.cabe.org.uk/publications/planning-for-places">www.cabe.org.uk/publications/planning-for-places</a> , The three key messages are as follows:</p> <p>The three key messages are as follows:</p> <p>Tell the story - A good core strategy needs to tell the story of the place, explain how it works and highlight its qualities and distinguishing features. Telling the story helps everyone understand how the qualities of the place have shaped the strategy and its priorities for future quality. For more information about telling the story, please refer to the CABE website: <a href="http://www.cabe.org.uk/planning/core-strategies/tell-the-story">www.cabe.org.uk/planning/core-strategies/tell-the-story</a></p> <p>Set the agenda</p> <p>Set the agenda: Use the core strategy to say what is wanted for the area, express aspirations and be proactive and positive about the future of the place and say how this will be achieved. Set out what is expected in terms of design quality and where necessary provide links to the relevant development plan documents or supplementary planning documents.</p> <p>For more information about setting the agenda, please refer to the CABE website: <a href="http://www.cabe.org.uk/planning/core-strategies/set-the-agenda">www.cabe.org.uk/planning/core-strategies/set-the-agenda</a></p> <p>Say it clearly - Make the core strategy relevant and understandable to a wide audience. Use diagrams to inform the text and communicate the strategy and show what quality of place means. For more information about saying it clearly, please refer to the CABE website: <a href="http://www.cabe.org.uk/planning/core-strategies/say-it-clearly">www.cabe.org.uk/planning/core-strategies/say-it-clearly</a></p> <p>It is also important that there is a clear priority for design quality and place-making objectives in the core strategy, setting out the key principles. This needs to be explicit so that it cannot be challenged when applications are being determined.</p>	<p>Although Barnet did not benefit from a CABE workshop we welcome this advice.</p> <p>Section 4 sets out what makes Barnet distinctive distilling the knowledge about the place, its community and its future. It sets clear priorities for design quality at different spatial scales in terms of the growth areas, town centres and our high quality suburbs and historic areas and makes linkages with AAPs, Town Centre Frameworks, SPD and other DPDs.</p> <p>There is a clear spatial agenda through the Three Strands Approach which enables the Core Strategy to integrate the needs of places with the issues that need to be addressed.</p> <p>A good Core Strategy is written in language that people can understand. It is important that the CS is clear and concise so that developers, the community, the council and its partners understand how the area will be changing, when it will change a role is. We consider that our priorities for Barnet over the next 15 years avoid the use of jargon wherever possible.</p> <p>Consultation on the Direction of Travel included meetings and presentations to a wide variety of groups and stakeholders explaining what we were doing, why we were doing it and how they could get involved</p>	None
4 4	1	Jon Cox	London	General	<p>The LDF document is inadequate regarding transport provision, even though the</p>	<p>The section on transport has been revised but the</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 1 6	2	Jon	Cox	London Campaign for Better Transport	General	<p>The Outer London Commission (OLC) was established by Mayor Boris Johnson to under-pin his commitment to his political heartland (Barnet was the only borough mentioned in his election manifesto) or at least to reverse the perceived over-concentration on inner London, by the previous administration. As the LDF makes clear, a final report was expected in 'autumn 2009' but as of January 2010 it is still awaited. However, the OLC has clearly been kicked into the long grass, and stopped being a proper strategic investigation part-way through its deliberations, when it was retro-fitted with a restrictive: 'RECOMMENDATIONS MUST BE PRACTICAL, REALISTIC AND TIGHTLY TIMETABLED'</p> <p>To meet a new political imperative of being seen to avoid any spending commitment or hostage to fortune. In that respect, its credibility has crumbled. Nevertheless, the Great and the Good did start with a remit including how to: "...improve infrastructure, especially the balance between different types of orbital and radial movement, strategically and locally</p> <p>And the 'Interim report' of July 2009 reported that: "Improvements to connectivity and movement within outer London are crucial. There is a strong feeling that improvement to orbital movement is especially important, coupled with realism over the scope for future large scale investment.</p> <p>The focus for investment should be based on a 'spoke and hub' concept rather than a contiguous high speed link around the city and there is considerable potential in smaller scale improvements."</p> <p>That last sentence was part of the deliberate down-grading from strategic planning to minor schemes, but it may have been to kill off the long distance West London Orbital tube line, rather than the more local light rail proposals. Quite late on in its proceedings, the OLC turned its attention to 'quality of life issues (although Barnet's public submission had mentioned it, unlike virtually all other boroughs, which concentrated on 'orbital transport and economic and training issues).</p> <p>Some of this is summarised in the Barnet LDF: "There is scope to enhance [quality of life] while accommodating growth, providing a sensitive approach is taken towards intensification."</p> <p>Our submission is that this is not being done by Barnet. The borough is attempting to impose giant road improvements' at its development sites, without any attempt to consider alternatives that is, to treat the large development sites, within and outside the borough, as providing the opportunity for entirely new orbital transport infrastructure.</p>	<p>We have revised the section on the London Plan to refer to the input of the OLC. We have revised the CS to incorporate the draft London Plan and its policy direction on Outer London.</p> <p>Please see responses at 416/7 and 418/18</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 1 6	3	Jon	Cox	London Campaign for Better Transport	General	<p>The LDF says that this study states that "... Improving transport links ALONG the corridor will be vital for [the] anticipated growth in employment."</p> <p>Two points are submitted: Firstly, the study also promotes links ACROSS the corridor (Navin Shah, AM for Brent and Harrow claims credit for that). Any study of a long rectangle, like this corridor, is bound to emphasize the radial routes (Thames link and the A5), but a study of an orbital sector of outer London (never carried out) would be bound to do the same for orbital routes.</p> <p>The 'North London Strategic Alliance' of boroughs, to which Barnet belongs, has never financed any serious orbital transport studies, although it has at least produced a January 2009 'Transport Priorities' paper, that states:</p> <p>"...Highway congestion and public transport overcrowding is already acute in many areas; there are gaps in connectivity, especially for orbital movements, and the capacity and quality of infrastructure and services often fails to live up to the aspirations of residents, businesses or communities. This is expected to worsen over time."</p> <p>Secondly, Barnet's verbal submission to the OLC asked: What was so great about large-scale long distance commuting anyway?</p> <p>This was in terms of trying to build new 'local' town centres (like Brent Cross) where, as in the 'Lester effect' that was mentioned by Barnet, office staff commute in, they work, they go home again. The benefit to the (literally) LOCAL economy is limited, except in terms of lower-grade jobs and lunchtime 'retail opportunities'. Barnet would not even benefit from the business rates gained, which go to central government.</p>	Please see response at 416/7 on the light rail proposal	None
4 1 6	4	Jon	Cox	London Campaign for Better Transport	General	<p>Barnet strategic planners will hopefully not be totally unaware of off-road light-rail proposals, which would join Brent Cross to Colindale, and maybe Mill Hill East, as part of a wider network involving neighbouring boroughs. Such a concept has been 'supported in principle' by Ealing and Harrow full council meetings (and hopefully Brent and Camden in the future).</p> <p>It is surprising to read that the Colindale and Mill Hill East Area Action Plans were (in order to support early delivery of housing) deliberately allowed to be prepared ahead the borough-wide Core Strategy. No wonder the AAP transport assessments were so parochial! Given that the previous Unitary Development Plan for the borough was so inadequate (and car-based) this explains why no serious, borough-wide, strategic transport assessment has ever been fed into the AAPs.</p>	Please see response at 416/7 on the light rail proposal The Core Strategy clearly states why AAPs were prepared ahead of the document.	None
4 1 6	5	Jon	Cox	London Campaign for Better Transport	General	<p>Same again, with knobs on!</p> <p>The case of Brent Cross Cricklewood is actually far worse. As the LDF says, the Brent Cross Cricklewood Development Framework was produced to:</p> <p>—...guide and inform design and delivery of development.</p> <p>Unfortunately, the (monopoly) Brent Cross developers have interpreted the Development Framework as an approved outline planning application. The consultation they have held over the last five years has been almost universally condemned as arrogant and in-effective. No significant changes to their EDAAW land-use plan has been tolerated. The local authority has been totally ineffective in promoting the aspirations and concerns of the public, compared to the private interests of the developers.</p>	Please see response at 416/7 on the light rail proposal. Brent Cross –Cricklewood including the Development Framework, London Plan and UDP has been subject to extensive consultation in the past 10 years.	None
4 1 6	6	Jon	Cox	London Campaign for Better Transport	General	<p>The Strategic Community Strategy of Barnet includes the theme of growing successfully. Barnet's second of its main strategic Three Strands Approach demands the enhancement and protection of the borough. Its third Strand promotes growth that is sustainable. Despite all three strategic statements above, Barnet risks being overwhelmed, or at least greatly harmed, by the transport impacts of its huge redevelopment sites, and they will also create increased air pollution from traffic (and 'incinerators') which harms the 'clean, green and safe' priority outcome of its '2009/10 Corporate Plan'.</p>	Transport impacts were considered using modelling work as part of the evidence base for the Area Action Plan.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 1 8	2	Julia	Hines	Age Concern	General	We support the planned growth in housing and employment, in particular the commitment to protecting the local environment and green spaces (2.3.3). Exercise has been proven to have a beneficial effect on reducing both morbidity and mortality from many of the most serious and prevalent diseases of old age including coronary heart disease, diabetes mellitus, cancer, depression and dementia. Maintaining mobility is also important in preventing falls.	We welcome this support	None
4 1 8	5	Julia	Hines	Age Concern	General	We support the sentiments in section 6, but would like to emphasise that accessibility and improving health should not just consider buildings. Even pavements, to encourage walking by older people, benches for older people to rest whilst out and public toilets, or a council run scheme whereby toilets in cafes and restaurants can be used by the public (with a notice advertising this in the window) in return for a small fee from the Council for providing this service, as occurs in other boroughs, all have strategic importance in making the borough more accessible and encourage people to walk rather than use other forms of transport and to support local shops and businesses.	Design consideration will be dealt with in the Development Management DPD. We do recognise that these issues have an impact on making places accessible and encourage their provision through design policies in the DM Policies DPD. We do recognise public toilets as community infrastructure.	None
4 1 8	2 3	Julia	Hines	Age Concern	General	Note that the evidence submitted to the Barnet Characterisation Study is attached to their submission.	This evidence will be passed to Urban Practitioners.	None
4 2 8	1	Daniel	Hope	Suburbs Foundation	General	+ Too few policies. Wording is opaque and vague. The Core Strategy is meant to be Barnet's interpretation of guidance and local need. It is meant to be a Barnet centred document. Our submission is that the Three Strands Approach requires a more detailed set of policies. It requires that the Three Strands Approach resolution, adopted by the Cabinet, drives the Core Strategy. This has not been the case.	The LDF is a folder of documents and the Core Strategy is at its heart. There is a clear spatial agenda through the Three Strands Approach which enables the Core Strategy to integrate the needs of places with the priorities that need to be addressed in Barnet. We are required to adopt a positive spatial strategy approach to DPD production and not reintroduce the 183 saved policies of the UDP.	None
4 2 8	2	Daniel	Hope	Suburbs Foundation	General	+ Document rushed. Characterisation study that should be lynchpin for core suburban policies is not yet complete. We participated at length and detail at the Issues and Options stage. There has been an unexplained leap from the Issues and Options stage to the publication of draft policies. The public have been excluded. The major piece of work to support the Core Strategy, the suburban Characterisation study (curiously contracted out to 'urban design' specialists by the Council) is not yet ready. Minutes of the Members Steering Group suggest it was due to be ready by mid 2009 but the document is still in draft. We do not see how the Council can proceed from I&O to DoT stage until this is complete.	PPS12 states that it is critical that Core Strategies are produced in a timely and efficient manner. The Direction of Travel and Issues and Options form part of the same regulatory stage (Reg 25) of the Development Plan regulations. We therefore do not consider it rushed. The Direction of Travel was informed by the draft Characterisation Study and this is clearly stated in the document. We also ensured that a draft version of the Characterisation Study was published as part of the consultation period.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 2 8	3	Daniel	Hope	Suburbs Foundation	General	<p>+ Out of kilter with national and regional policy. Does not follow the binding Three Strands Approach. Barnet had put forward to the former Mayor of London plans for massive growth, centred in the clearly defined growth areas. The old London Plan, soon to be replaced, encouraged high density development which Barnet Council sought to exceed. The new replacement draft London Plan puts the break on such developments and seeks to encourage densities that sit well in the surroundings. Even though Barnet is in on target to meet the growth targets it persuaded Ken Livingstone to accept, the DoT document seeks to spread growth out from the specified areas and areas with high public transport accessibility. Outside of the scope of the Three Strands Approach, policies in the DoT encourage intensification outside of formal Town Centres and along unspecified 'major thoroughfares'. Whereas the Three Strands Approach calls for the retention and promotion of houses in suburban areas, the LDF CS DoT calls for houses to be torn down and replaced with flats</p> <p>Further due to the rush to publish the DoT no account could be made of the Draft Replacement London Plan which the Mayor calls on Planning Authorities to treat as a weighty material consideration. Despite this call the Council seeks to hard wire into the Core Strategy the Ken Livingston density matrix into Barnet's policy.</p>	<p>Barnet's Core Strategy has clearly anticipated the Mayor's own direction of travel on the London Plan. It has highlighted the need to optimise rather than maximise housing density and to reflect local context, public transport accessibility and provision of social infrastructure. The Density Matrix in the draft London Plan (table 3.2) is the same as the one in the London Plan 2008. Higher density development is therefore not discouraged by the draft revised London plan which seeks to optimise the potential of sites.</p> <p>Major thoroughfares are no longer promoted as providing opportunities for infill housing development We have conducted extensive consultation on the Direction of Travel which has involved the Civic Network, Citizens Panel, Residents Forums, the Local Strategic partnership board and nineteen individual meetings with local interest groups or representative bodies. These meetings and presentations explained what we were doing, why we were doing it and how they could get involved. The Council's consultation with the community at both stages can be demonstrated by the level of response we have received.</p>	None
4 2 8	4	Daniel	Hope	Suburbs Foundation	General	<p>+ Breach of SCI and PPS12</p> <p>The Foundation is concerned at the half hearted engagement with the public, that the Council has had in relation to the LDF CS. This is most clearly shown in something that the Council committed itself in the SCI and is entirely in its control. In the SCI the Council committed itself to producing a centre page special insert in Barnet First at each stage of the process. The Council failed to produced the detailed insert at I&amp;O or DoT stage in Barnet First. In fact at the I&amp;O stage Barnet First made no reference to the LDF CS consultation (something the Council admits in its report). At the DoT stage there was a very brief mention inviting people to go to the website. PPS12 and the SCI require the Council to engage the community in 'continuous engagement, specifically those consultations shouldn't be 'one off events. As one of the most significant contributors to the I&amp;O stage we expected to be kept informed of progress towards the Council producing draft polices. However a whole series of meetings with Councillors and Officers were held behind closed doors which the public weren't informed of or able to contribute too. Had Barnet followed Enfield's example of a formal Cabinet Sub Committee this would have happened. The DoT document was brought before the Cabinet in a report at a time before the I&amp;O November 2009 Consultation Report had been published and before the Draft Characterisation Report was ready. It is our contention that the Cabinet should have sent the report back for more work, it was clearly not ready. Further they should not have made a resolution without directly seeing the representations. The Consultation Report contained scathing criticism from the citizens' panel and others over the scope of consultation and jargon used. This was withheld from the Cabinet.</p>	<p>To ensure that the Core Strategy is sound it must be justified and built on a robust and credible evidence base. This evidence includes the views of the local community and others who have a stake in the future of the area. This is set out in the document. The extent of consultation is further set in the Direction of Travel consultation report. A good Core Strategy is written in language that people can understand. It is important that the CS is clear and concise so that developers, the community, the council and its partners understand how the area will be changing, when it will change and what their role is. We consider that our priorities for Barnet over the next 15 years avoid the use of jargon wherever possible</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 2 8	5	Daniel	Hope	Suburbs Foundation	General	<p>+ Cabinet have been disengaged in the process. Needs fresh leadership. It is common for members' of Barnet's Cabinet to publicly admit of the lack of knowledge of Planning matters. Unlike Planning Committee councillors we are unaware of any training Cabinet Members have undertaken on Planning Policy matters. Similarly we are unaware of any of the several meetings that have taken place between community representatives and the Community where any Cabinet Member has sat in or taken part in. As previously mentioned, we believe Enfield Council have the right approach. They have a specialist Sub Committee of Cabinet which, it is clear, drives the strategic approach to the LDF. The minutes are clear and precise and show resolutions. Compare this to the Barnet 'Members LDF Steering Group' which has vague minutes devoid of decisions and focus on trivia.</p> <p>We submit that the Cabinet should attend external Planning training, take control of this document through a sub committee so that Barnet's needs can come forward in policy - just as has happened in neighbouring Enfield. The Foundation contends that the Council has jumped too far too fast. The Council needs to withdraw these draft policies and return to the results of the I&amp;O stage. A sub committee of Cabinet, under fresh leadership of the Planning Service, needs to look at the results of the I&amp;O stage together with the Three Strands Approach Cabinet resolution and the new draft replacement London Plan, together with Enfield's and Westminster's Core Strategies and produce a Barnet centred document that Puts the Community First.</p>	The cross party LDF members Steering Group is considered an appropriate forum for taking the LDF forward and has been operational since 2007. We have carried out training for all Councillors on the LDF and have made presentations on the Core Strategy to all political groups on Barnet Council.	None
4 2 9	1	Gaby	Kagan	Labour Group	General	<p>If Barnet's population does increase over the next 15 years from 331,000 to 384,000 as GLA projections indicate, then we must have plans to manage and provide for that growth. Considering the present problems we face with the dire need for affordable housing, the pressure on school places, the unsustainable volume of car use and the lack of good east-west public transport links, it's unfortunate that the Strategy does not indicate more clearly how this might be done or even give the impression that these challenges will be seriously addressed.</p> <p>The 'preservation' of Barnet as it is and as envisaged in the Three Strands policy document is the theme that pervades this Strategy. But the "preservation" of Barnet will not occur if robust and enforced policies on tackling climate change, encouraging a shift to more sustainable modes of travel and developing proper orbital public transport links do not get the required prominence and emphasis within this Strategy.</p> <p>The Strategy does not give enough emphasis to housing need, and in particular to the proportion of residents and families in Barnet on average and lower incomes who have household incomes of less than £40,000 per annum and will therefore not even be able to afford to take advantage of discounted or shared ownership schemes to buy a home in the borough. Barnet has over 17,500 families on the housing waiting list. The council housed just 419 families from the list in 2008/9, so at that rate of re-housing it will take 40 years to 'clear' the list as it is, before even beginning to deal with the issue of the envisaged population growth to 384,000 by 2026. The need to build affordable homes for rent cannot be overstated or emphasised enough and should take more prominence in the Strategy if we are to retain a balanced community.</p>	In line with the need to ensure that the Core Strategy is deliverable an Infrastructure Delivery Plan will be provided at the publication stage. Policy in CS9 sets out what key transport infrastructure is going to be provided to support growth. The infrastructure delivery plan sets out what, when, where and how it translates into delivery over the next 15 years including transport, community facilities and parks. The Core Strategy clearly addresses these issues and the SHMA provides the evidence of housing need. On this basis we have set a target for affordable housing and a n appropriate tenure split.	Revise CS 4 and CS9 Publish Infrastructure Delivery Plan
4 3 0	1	Dennis	Pepper	Barnet Borough Group London Wildlife Trust	General	<p>Direction of Travel does not confine itself to delivering sustainable development. Quite rightly it 'addresses other factors' (1.2.1) too, though in our view these should not be restricted to making places 'attractive and distinctive.' The effects of extensive new developments go beyond 'balancing the needs of residents, businesses and future generations'.</p>	We do recognise the importance of habitats and species and the need to protect and enhance these.	Revise Section 12.5

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

430	2	Dennis	Pepper	Barnet Borough Group London Wildlife Trust	General	<p>Although the document states (1.1.3) that it is 'not necessary (our italics) for the Core Strategy to repeat either national or London Plan policy' it is nevertheless highly desirable that it should do so: it is important that the links are made here even though it may well be expanded in subsequent DPDs and SPDs. This applies also to policies contained in the current UDP. Such an open procedure would make reference to relevant national and regional policies easier for all users.</p> <p>We note, for instance, that the Direction of Travel makes no reference to Barnet's support for the purposes of Green Belt land, to the Mayor's 'Blue Ribbon Network', or to Barnet's support for the objectives of the Watling Chase Community Forest. The ways in which all of these are incorporated into the 'direction of travel' Barnet is engaged on are relevant to the quality of life of future generations. It is, of course, not only people who will be affected.</p>	<p>We do recognise that not only people will be affected and have added references to Habitat Corridors, Blue Ribbon Network and Watling Chase. The map, distribution of natural space has been revised to highlight Barnet's watercourses. The London Plan forms part of Barnet's development plan and it is therefore not necessary to repeat national or London Plan policy. The Core Strategy provides a list of UDP policies at Appendix C and sets out how they will be replaced by the Core Strategy.</p>	<p>Add references to Blue Ribbon network and Watling Chase Community Forest.</p>
430	4	Dennis	Pepper	Barnet Borough Group London Wildlife Trust	General	<p>One core objective is to enhance and protect our green and natural open spaces (p.21), but as 'places for recreation and biodiversity' without any indication that increased human activity may well harm or destroy this ecological diversity (in which Barnet has so far shown no practical interest). It is noticeable, for example, that in the AAPs at BX/C, Colindale and Mill Hill East the areas of green space have been significantly reduced (and isolated) and that what left or opened up has been given over to sport and recreation.</p> <p>Barnet is, we are told, 'rich in green spaces and biodiversity.' We are not told that both are in decline in the borough (house sparrows, skylarks and hedgehogs – to name but three – are fast disappearing). If the current 'direction of travel' is not redirected the situation will be substantially worse in the vibrant new suburb of 2026. We recommend that the Planning Authority look again at Barnet's ecology with the intention of ensuring that the primary function of our green spaces is not abandoned to the (understandable) wish to provide for people's enjoyment and recreation.</p>	<p>We refer to our earlier response at 430/2</p>	<p>New paragraph 12.5.4 on habitat corridors recognising the need for species to move between different types of habitats.</p>
430	11	Dennis	Pepper	Barnet Borough Group London Wildlife Trust	General	<p>On an entirely different matter, we think that Table 1 (pp. 21-24) is both confused and confusing as it mixes policies and objectives and, also confusingly, incorporates 'ambitions' as well. We think it important to separate aims (ambitions) and objectives from one another and from the policies devised to achieve them.</p>	<p>Table 1 clearly shows the linkage between the structure of the Sustainable Community Strategy and the Core Strategy.</p>	<p>None</p>
432	1	Helen	Massey	Barnet Residents Association	General	<p>We have found many positives in this document. We are particularly pleased with the departure from the "one size fits all approach", and that individual solutions will be sought for each of the individual town centres. We believe it is only in this way that there is any hope of engendering any sense of civic pride. We look forward to making a constructive contribution to the eventual strategy for High Barnet.</p>	<p>We welcome this support</p>	<p>None</p>
432	2	Helen	Massey	Barnet Residents Association	General	<p>A general concern which we expressed at the "Issues and Options" stage and again when you came to talk to FORAB is that so much of your vision and strategic objectives expressed in sections 1-6 are dependent on the actions of other stakeholders. Whilst the vision might be laudable we are not convinced that the Council's strategy for the next 15 years should be so heavily reliant on something over which they have such little control. Surely the Council has to set its objectives according to what it can achieve? An objective might be to encourage TFL to deliver integrated transport but TFL not the Council has to deliver it.</p>	<p>Core Strategies should show how the vision, objectives and strategy for the area will be delivered and by whom and when. This includes the provision of infrastructure to support the growth highlighted in the Core Strategy. In line with national planning policy guidance an infrastructure delivery plan will be produced which will provide detail on what infrastructure will be provided and where. This IDP must be strong enough to stand up to independent scrutiny.</p>	<p>Publish Infrastructure Delivery Plan</p>

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 3 2	3	Helen	Massey	Barnet Residents Association	General	<p>A more specific concern is that section 5 on the challenges to be faced might be seen as a touch one sided. The positive bullet points at the start need to be balanced by the negatives, which are causing difficulties. The rest of section 5 could then be more clearly focused on how the positives might be enhanced and the negatives tackled. The negative bullet points might be</p> <ul style="list-style-type: none"> <li>• Shortage of affordable housing</li> <li>• Areas of deprivation</li> <li>• Limited entertainment and recreation facilities</li> <li>• Declining town centres</li> <li>• Traffic congestion</li> <li>• Poor east/west public transport facilities.</li> </ul> <p>Most of these points are covered in the later detailed sections of the document. However, we don't believe that traffic congestion receives the attention that it should; it is a major problem but barely gets a mention. Nor do we think that having lots of green belt and parks is an acceptable substitute for leisure facilities. A misjudged scheme to centralise facilities - arts depot – is one that we hope will be avoided in the future.</p>	<p>We consider that Section 5 provides a fair portrayal of Barnet's challenges including deprivation.</p> <p>Traffic congestion is highlighted as an issue in the section on providing effective and efficient travel. The Leisure Facilities Strategy is currently modelling unmet need to facilities and will inform the Infrastructure Delivery Plan.</p>	None
4 3 3	1	Georgia	Wrighton	Women's Design Group	General	<p>The Core Strategy clearly outlines the social and economic issues faced by the borough over the period of the plan (next 15 years) which include challenges to accommodate successfully a growing population. The population growth is anticipated to result in residential community which is more diverse, and with a higher number of both very young and old residents. This in turn will require an appropriate level of community, social, health and education facilities. The Core Strategy also confirms that whilst Barnet is a successful borough, it also has some of the top 10 most deprived areas nationally.</p>	We welcome this support	None
4 3 3	2	Georgia	Wrighton	Women's Design Group	General	<p>The Core Strategy refers often to the need for sustainable development and consideration of climate change, but principles set out in the document, like the statement in paragraph 14.8 that the 'the car is set to remain as the most dominant form of transport in outer London' conflict with this aim and overall there appear to be inadequate policies and measures to tackle this issue given the level of growth proposed.</p>	<p>We have to acknowledge that many residents are largely reliant on the car for necessary journeys. We therefore highlight the objective as reducing the need to travel and to keep Barnet moving in a sustainable way which provides choice by widening the travel option available.</p>	Revise 6.2.1
4 3 6	1	Robert	Newton		General	<p>Reason: The London Plan (February 2008) is being overtaken by events. Delete wording in Paragraph 2.7.3 and replace with: "The London Plan is expected to be significantly revised over the Core Strategy Plan Period and it is likely that it will be reduced in size and detail for at least some of the period. Therefore the Core Strategy has been drafted to provide a robust, locally distinctive policy framework for Barnet that does not repeat regional guidance but also minimises risk to delivery from changes to the London Plan." [See paragraph 2.18 of the City of Westminster Core Strategy Publication Draft (November 2009)].</p>	<p>Barnet's Core Strategy is likely to be adopted before the review of the London Plan is completed. To be in general conformity we have to reflect the policy approach of the existing London Plan while signposting the changes highlighted in the draft London plan.</p>	Revise Section 2.8 on London Plan
4 3 7	5	P E	Pickering		General	<p>One drafting point. The document is inconsistent between 'Finchley Church End' and 'Finchley Central'. The latter is the name of a tube station, and the former should be used.</p>	Agree	Replace references to Finchley Central with Finchley Church End

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

438	1	Les	Morris	National Grid	General	<p>The Preferred Options report highlights Mill Hill East area as a Growth Area, delivering around 2,500 homes and 500 new jobs. National Grid own and operate Mill Hill substation which is located in the vicinity of the Mill Hill East Growth Area.</p> <p>While National Grid does not object to future redevelopment in this area, we would like to take this opportunity to highlight that substations are vital to the efficient operation of our electricity transmission network for switching circuits or transforming voltage. Mill Hill substation is an essential part of the transmission network and has an important role to play in maintaining the supply of electricity to the local distribution network operator and therefore ultimately to homes and businesses throughout Barnet and the wider area. The site is therefore "Operational Land" and, for the reasons outlined above, there may need to be further essential utility development at the site in the future.</p> <p>In addition, National Grid has high voltage underground electricity transmission cables passing through the following areas identified for development within the Preferred Options document:          § Colindale § West Hendon § Cricklewood / Brent Cross § Finchley-Church End</p> <p>Our underground cables are protected by renewable or permanent agreements with landowners or have been laid in the public highway under our licence. These grant us legal rights that enable us to achieve efficient and reliable operation, maintenance, repair and refurbishment of our electricity transmission network. Hence we require that no permanent structures are built over or under cables or within the zone specified in the agreement, materials or soil are not stacked or stored on top of the cable route or its joint bays and that unrestricted and safe access to any of our cable(s) must be maintained at all times</p> <p>The information supplied is given in good faith and only as a guide to the location of our underground cables. The accuracy of this information cannot be guaranteed. The physical presence of such cables may also be evident from physical protection measures such as ducts or concrete protection tiles. The person(s) responsible for planning, supervising and carrying out work in proximity to our cable(s) shall be liable to us, as cable(s) owner, as well as to any third party who may be affected in any way by any loss or damage resulting from their failure to locate and avoid any damage to such a cable(s).</p> <p>The relevant guidance in relation to working safely near to existing underground cables is contained within the Health and Safety Executive's (<a href="http://www.hse.gov.uk">www.hse.gov.uk</a>) Guidance HS(G)47 "Avoiding Danger From Underground Services" and all relevant site staff should make sure that they are both aware of and understand this guidance.</p>	These are detailed matters more appropriate to individual proposals and not to the Core Strategy.	None
439	1	Zenda	Green	Mill Hill Preservation Society	General	<p>Mill Hill Preservation Society are deeply concerned how Mill Hill can maintain it's character and identity when Barnet Council propose to build 28,000 new homes in the Borough of Barnet by 2026 (P19) and project a population of 384,615. With such significant density this will destroy the surrounding suburban character. Barnet Council need to make sure that Mill Hill's character and identity is fully protected and enhanced through the LDF.</p>	<p>The Core Strategy clearly highlights the contribution of growth areas such as Mill Hill East to the growth of Barnet.</p> <p>Section 4 sets out what makes Barnet distinctive distilling the knowledge about the place, its community and its future.</p> <p>It sets clear priorities for design quality at different spatial scales in terms of the growth areas, town centres and our high quality suburbs and historic areas. It makes linkages with AAPs, Town Centre Frameworks, SPD and other DPDs.</p> <p>There is a clear spatial agenda through the Three Strands Approach which enables the Core Strategy to integrate the needs of places with the issues that need to be addressed.</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

439	12	Zenda	Green	Mill Hill Preservation Society	General	<p>Mill Hill Preservation Society seek clarity from Barnet Council because the London Plan sets 3,500 new homes for Mill Hill East by 2026, although the Local Development Framework commits to a total of around 2,660 residential units including 2,000 new units (P26). This needs clarity because we consider the housing density figures in the core strategy to be too high. We feel that the figures should be lower to limit any further increase in density that would have a significantly detrimental impact on Mill Hill's suburban character. It's good that Barnet Council has a Vision and Objective (P19) but it has been forced upon Barnet by the Mayor, who has set very ambitious housing targets.</p>	<p>The adopted AAP for Mill Hill East is in general conformity with the London Plan. Over its 15 year life span the area is expected to delivery 2,000 new homes. Housing density in the Core Strategy reflects the matrix set out in the London Plan.</p>	None
						<p>We would also seek clarity to how the Local Development Framework will promote and police design. This is crucially important if Mill Hill is to retain its character and identity. To conclude as previously mentioned, Barnet's strengths in particular Mill Hill as a successful suburb are underpinned by its historic character, wealth and quality of green spaces, it's medium to low housing density, good public transport links and reasonably good community facilities. Our Green Belt, Open Spaces, Village Greens and Conservation areas including key character areas –The Ridgeway, Mill Hill Village, etc need absolute protection in order for The Borough of Barnet to remain a thriving and sustainable Borough. Mill Hill has already lost a lot of its suburban appeal and green space with the growing number of back-garden developments, in-fills, the massive developments at Mill Hill East, Cricklewood and Colindale and we wish to lose no more. Barnet Council must do more to protect Mill Hill and its unique natural beauty.</p>	<p>The Core Strategy provides a hook for more detailed policies for the Development Management policies DPD which will provide a policy framework for protection, conversion and redevelopment of suburban housing. We are producing Residential Design Guidance SPD to provide design guidelines for places with a consistent and coherent architectural character. The Residential Design Guidance SPD will address infill development. Design Guidance Note 5 addresses extensions to houses and has recently been revised. Our approach to protecting and enhancing Barnet's open spaces is clear in the Core Strategy.</p>	
440	1			Brent Cross Cricklewood Development Partners	General	<p>In accordance with the London Plan, the Development Partners support the identification of BXC as a key growth area in the borough. As the Council will be aware, on the 19th November 2009 the Planning &amp; Environment Committee resolved to grant planning permission, subject to the completion of a Section 106 Agreement, for the comprehensive regeneration of the BXC site. Therefore, the thrust of these representations focus on ensuring that the emerging policy is consistent with the existing Development Framework and the content of the application proposals which formed the basis of the resolution to grant.</p>	<p>In order to secure a strategic policy framework for the future regeneration of Brent Cross Cricklewood we have produced a new policy that provides a link with the 'saved' suite of UDP policies on Brent Cross Cricklewood. Any future applications for the area will be determined in accordance with the Core Strategy 'saved' suite of UDP policies on Brent Cross - Cricklewood, the London Plan and the Development Framework Supplementary Planning Guidance (adopted in 2005).</p>	Insert new policy CS2
440	2			Brent Cross Cricklewood Development Partners	General	<p>Paragraph 1.4.2 identifies that an application for the regeneration of BXC has been submitted. However, given a resolution to grant has now been secured it is suggested that the text is updated by adding following sentence:  <u>The Council has resolved to support the application for the regeneration of Brent Cross Cricklewood subject to the completion of a Section 106 Agreement.</u></p>	<p>This section has been updated to reflect the Councils resolution to approve the outline application subject to a S106. The box on Brent Cross - Cricklewood will be updated to reflect progress on the planning process.</p>	Revise information box

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 4 1	1	Warren	Forsyth	Middlesex University	General	<p>As a key stakeholder in the Borough and an active member of the Local Strategic Partnership, the University has been involved in all stages of the LDF process to date and has made appropriate representations on the emerging Core Strategy and the options being considered. These have been fairly reported and taken account of in the Council's reports on consultation, and the University's aims and aspirations for expansion and consolidation in the Borough have been duly recognised.</p> <p>Overall, the University fully supports the strategic thrust of the Core Strategy Direction of Travel, its Vision and Objectives and Barnet's place shaping strategy with its balanced Three Strands Approach. The need to keep the document strategic, avoid repetition and attribute matters of greater detail to other Development Plan Documents such as the Colindale AAP and the yet to be produced Site Allocations DPD is recognised and we feel has generally been accomplished in a sound and balanced draft Core Strategy. The more detailed representations set out below are intended to be helpful and constructive, and should be considered in the context of the University's strong overall support for the Core Strategy Direction of Travel. They indicate elements of the document of particular relevance to the University which are fully supported, and suggestions for alterations or additions to text where these would provide greater clarity or address some ambiguity or unintended error. We also take the opportunity at this stage to identify some of the matters of importance to the University that are to be addressed in other DPD documents.</p>	We welcome this support	None
4 4 1	2	Warren	Forsyth	Middlesex University	General	<p>The intention that the Core Strategy should reflect the strategies and programmes resulting from joint working with members of the Barnet Local Strategic Partnership, and the explicit recognition of Middlesex University as a LSP partner are welcomed. The University's aspirations to expand and consolidate its operations on the Hendon campus and provide new and improved student accommodation in the Colindale AAP area have been supported by the Council and remain in line with the strategic aspirations of the Core Strategy.</p>	We welcome this support	None
4 4 1	3	Warren	Forsyth	Middlesex University	General	<p>It would be helpful if this section acknowledged the importance of the existing Further and Higher Education sector establishments to the economy of Barnet, as providers of direct and indirect employment, as well as providing educational, training, CPD and business support services to local residents and employers. We suggest adding a new second sentence to paragraph 4.7.3 such as: "The Borough benefits from a strong higher and further education sector, which provides jobs as well as education, training and business support for its residents and employers."</p>	Agree	Revise 4.7.3
4 4 1	4	Warren	Forsyth	Middlesex University	General	<p>The need for infrastructure to be developed to support growth is fully supported by the University, and Middlesex University has a key role to play in providing appropriate facilities and programmes to meet the needs of an increasing population and expanding economy.</p> <p>We suggest that the list of types of infrastructure itemised in paragraph 5.1.8 be slightly expanded to add, after "...schools," "further and higher education establishments".</p>	Agree	Revise 5.1.8
4 4 1	6	Warren	Forsyth	Middlesex University	General	<p>The University supports the Council's Vision statement in paragraph 6.1.1, the four themes in paragraph 6.1.2 and Barnet's core objectives in 6.2. We suggest, however, that the amplification of the objective "To meet social infrastructure needs" be expanded by the addition of another bullet point sub-objective "to support the improvement and expansion of further and higher education establishments to meet the needs of a growing population and economy."</p>	Agree	Revise sub objective on social infrastructure

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

441	8	Warren	Forsyth	Middlesex University	General	The University strongly supports the enhancement and, where feasible, the shared usage of playing fields and outdoor sports pitches at Copthall where they would be easily accessible to students and staff at the Hendon campus and where the University could support sports training and education initiatives. We understand that this could be covered in the forthcoming Site Allocations DPD.	The Site Allocations DPD is the appropriate document for site specific considerations such as any improvement at Copthall.	None
441	10	Warren	Forsyth	Middlesex University	General	The University supports the enhancement and expansion of swimming and indoor sports and leisure facilities at Copthall, where it is keen to work in partnership with the Council to significantly improve the leisure and recreation facilities for joint community and University usage. This may be a matter for the Site Allocations DPD, although a meaningful development would require at least the recognition that the existing Copthall Centre and related development is a "Major Developed Site in the Green Belt". We would welcome clarification and confirmation that such a designation to enable the leisure facilities to be expanded could be dealt with in the Site Allocations DPD, without a further reference being added to the Core Strategy.	The Site Allocations DPD is the appropriate document for site specific considerations and we would welcome any discussions with Middlesex University on this.	None
442	2			British Library	General	The BL supports the LB Barnet Vision and Core Objectives set out in Chapter 6 of the Core Strategy. The BL note Objective 1 which includes 'managing housing growth to meet housing aspirations through promoting the development of the identified major growth areas' in order to provide 25,000 new homes by 2026 to meet local and regional housing needs. The BL supports this Objective and notes that the CAAP, and the BL's allocation within Colindale, will help LB Barnet meet its housing aspirations.	We welcome this support	None
443	1			Metropolitan Police Authority	General	Paragraph 1.2 highlights the MPA as a Local Strategic Partner The MPA support the opportunity to work alongside Barnet and therefore support this reference	We welcome this support	None
443	2			Metropolitan Police Authority	General	Paragraph 6.2 highlights the core objectives to deliver the borough's vision. Under the heading 'to meet social infrastructure needs' a number of community facilities are outlined. However policing is not recognised as a community facility, contrary to Policy 3A.17 of the London Plan. the MPA therefore recommend that the wording of the bullet point be amended to including policing (additional wording underlined): - To ensure provision for community needs arising from housing growth including education, policing, health, social care and integrated community facilities;	Agree	Revise sub objective on social infrastructure
443	3			Metropolitan Police Authority	General	Furthermore, under the heading 'To promote strong and cohesive communities the MPA previously made representations to include reference to policing facilities, however this was not taken on board. The MPA wish to reiterate the need for increased policing facilities in the borough to ensure safe and secure communities are created. This reflects the national guidance of PPS1 which states (paragraph 27 (iii)(Delivering Sustainable Development)) that development plans should promote safe and crime free communities. Recommendation: The MPA wish to make the following amendment to this bullet point in order that the emerging core strategy reflects national guidance - To create the conditions for a safer and more secure Barnet by designing out crime and reducing anti-social behaviour, particularly in known 'hotspots', and through supporting enhancements to policing facilities.	The provision of policing facilities has already been highlighted as meeting our infrastructure needs	Revise sub objective on social infrastructure

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 4 5	1	Joanne	Woodward	London Borough of Enfield	General	<p>Paragraph 5.1.5 states that over the next 20 years, Barnet will build over 28,000 new homes. The majority of these dwellings (20,000) will be delivered in three growth areas: Brent Cross-Cricklewood, Colindale and Mill Hill East. These areas are also identified in the London Plan as having significant potential for accommodating new homes and jobs and area action plans (AAP) or master plans have been prepared for these areas. Along with the proposed housing growth approximately 21,000 extra jobs will be created as a result of the regeneration of these major growth areas.</p> <p>This is a considerable growth agenda for the borough and it is crucial that sufficient supporting infrastructure is planned for and delivered alongside this increase in population.</p> <p>The major infrastructure needs such as transport, schools and health services must be matched with the growth to prevent adverse impacts both within the borough and on surrounding boroughs. Some services are already at or near capacity in simply meeting the needs of the existing population. Robust infrastructure planning is needed to ensure the needs of both the existing and new populations. Enfield Council is currently preparing an Infrastructure Delivery Plan to support the delivery of its Core Strategy and would welcome opportunities for a joint approach to infrastructure planning with Barnet and other infrastructure providers particularly for communities living close to the border of our boroughs.</p>	<p>Barnet welcomes the opportunity to work jointly on cross boundary needs. Much of this growth is in Mill Hill East and Colindale. Both of these areas are subject to adopted AAPs which have demonstrated delivery of infrastructure to support growth. This work forms part of our Infrastructure Delivery Plan</p>	<p>Publish Infrastructure Delivery Plan</p>
4 4 5	2	Joanne	Woodward	London Borough of Enfield	General	<p>This is particularly pressing as according to the housing trajectory on page 30, between approximately 2,000 and 3,000 dwellings will be provided each year starting 2011/12 through to 2016/17, with dwelling numbers dropping each year after 2016/17. This means more than half the proposed dwellings (i.e. 17,000) for a 20-year period will be delivered in a 6 year period. This is a short time frame, commencing next financial year in which to supply supporting infrastructure.</p>	<p>Please see response to 445/1</p>	<p>None</p>

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 4 6	1	Graham	Saunders	English Heritage	General	<p>As the Government's adviser on the historic environment English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all stages in development of the Core Strategy for Barnet. In general English Heritage is encouraged by the emphasis upon protecting and enhancing the character of the Borough through Policy CS3. However we gravely concerned that there appears to be a lack of a robust policy framework in which to manage the historic environment or unique developments such as tall buildings. These are serious omissions which appear to be contrary to national guidance. Further comments on these points are provided below and in our detailed comments.</p> <p>On considering the details of the Draft Core Strategy we have the following headline comments to make which we believe will help strengthen the quality of the Plan:</p> <ul style="list-style-type: none"> <li>• Heritage Policy</li> </ul> <p>The general approach of protecting and enhancing the character of the Barnet is welcomed in that it provides a broad framework in which to manage the Boroughs wider environment. However the Core Strategy in its current form does not provide a sufficiently robust policy framework in which to protect and enhance the historic environment. This is a fundamental concern which is contrary to advice provided by PPG15 and PPG16. To rectify this current omission a specific Core Strategy policy that recognises and values the historic environment as an asset, a key component of the Borough's character and potential catalyst for heritage-led regeneration should be included. This should be backed up with robust evidence that defines the Borough's historic environment as advised by PPS1 and PPG15.</p> <ul style="list-style-type: none"> <li>• Tall Buildings</li> </ul> <p>The lack of a policy framework in which to manage tall buildings is a significant concern. Government endorsed, EH/CABE Guidance on Tall Buildings (2007) (EH/CABE Guidance) clearly recommends that local planning authorities set out a plan-led approach to tall buildings. This omission raises concerns with regard to the robustness of Barnet's planning policy framework to manage proposals for tall buildings and the potential impact they may have upon the historic environment. To rectify this current situation a specific Core Strategy policy that sets out a plan-led approach to managing tall buildings, based on robust evidence, in accordance with EH/CABE Guidance should be provided.</p> <ul style="list-style-type: none"> <li>• Characterisation Study</li> </ul> <p>We are encouraged by the Borough's commitment to gain a greater understanding of the character of their area. However there are concerns with regards to the coverage of the study and how it could be used to inform key policy areas such as heritage and tall building issues. English Heritage views were initially. However we have not been involved in the most recent development of this important study. Our continued involvement would be further welcomed as the purpose of this work as evidence base is important for many of the points raised in this letter.</p> <ul style="list-style-type: none"> <li>• Town Centres and Open Spaces</li> </ul> <p>The heritage value of the Borough's town centres and open spaces needs to be explicitly recognised and incorporated into the appropriate policy and supporting text.</p> <p>English Heritage would strongly advise that the Borough's own conservation staff are closely involved throughout the preparation of the Core Strategy and associated Sustainability Appraisal, as they are often best placed to advise on: local historic environment issues and priorities, sources of data and consideration of options relating to the historic environment</p>	<p>We have addressed the gaps identified by English Heritage in the Publication Stage.</p> <p>We are governed by statutory requirements for listed buildings and conservation areas.</p> <p>PPS12 makes it very clear that the Core Strategy should not repeat or reformulate national policy.</p>	<p>Add new section 10.4 on Barnet's heritage.</p> <p>Add to supporting text of CS 5 a new section 10.6 on Barnet's skyline and tall buildings</p> <p>Revise CS 5 on tall buildings</p>
-------------	---	--------	----------	------------------	---------	---	--	--

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 4 6	2	Graham	Saunders	English Heritage	General	It is noted that we have not been sent a copy of the emerging Proposals Map for comment at this stage. We would advise that when reviewing the Proposals Map that all up-to-date areas of protection such as conservation areas, archaeological priority areas, registered historic parks and gardens and strategic views are included as stipulated by section 8 'Proposals Map' of Planning Policy Statement 12 – Local spatial planning (PPS12). When the next stage of the consultation takes place, do send us a copy of the Proposals Map as well.	The Proposals Map will be updated as part of the consultation on the Development Management DPD and Site Allocations DPD. A final Proposals Map will be published when the LDF is completed	None
4 4 6	3	Graham	Saunders	English Heritage	General	Noted that a suite of supplementary planning documents and design guidance notes are to be provided. Clarity on their subject matter and whether any of them will relate to the historic environment needs to be provided.	This matter is addressed in the Local Development Scheme (LDS).	Publish Draft LDS
4 4 6	4	Graham	Saunders	English Heritage	General	We note the relationship of the AAPs and Development Frameworks with the Core Strategy in terms of timing and priority. However it is not clear what evidence base has been used for the AAPs and whether it incorporates heritage matters. Also it is not clear whether this evidence base has been used to inform this Core Strategy. Clarification on this point would be useful.	The AAP evidence base incorporated heritage matters and English Heritage were involved in the development of that evidence. English Heritage had the opportunity to express any concerns on the historic environment in the extensive engagement process that took place on both AAPs. An AAP is area specific with more detailed development proposals while a Core Strategy is a borough wide strategic document. It is not a borough action plan.	None
4 4 6	5	Graham	Saunders	English Heritage	General	We welcome in general the attempt to summarise the character of Barnet and note that a borough wide Characterisation Study is being produced as part of the evidence base to the Core Strategy. However, what lacks from the description given in paragraph 4.2 is a strong sense of the existing historic environment and the range of heritage assets Barnet contains. This includes the only Battlefield in London, extensive archaeology, and a rich and diverse range of listed buildings and registered parks and gardens. In addition the Borough has a wealth of locally significant buildings, spaces and areas that may not be designated assets, but are still of importance in defining the character of Barnet. Maybe further information from the once completed Characterisation Study could help clarify and strengthen the current description.	We do recognise our historic environment in the Core Strategy	Add new section 10.4 on Barnet's heritage. Revise CS 5
4 4 6	6	Graham	Saunders	English Heritage	General	Support in general the inclusion of the core objective to protect and enhance the suburbs. We would suggest that this objective is expanded by including an explicit reference to the promotion of heritage-led regeneration as a priority and improved access to understanding and appreciating the Borough history and heritage.	Agree	New sub objective has been added on heritage led regeneration
4 4 6	9	Graham	Saunders	English Heritage	General	Support in general the approach of this section of the Core Strategy. However as demonstrated in this paragraph the focus of the historic environment is the Borough's conservation areas. Registered historic parks and gardens are mentioned, but other heritage assets that also define the Borough and require protection and enhancement are not mentioned, such as listed buildings and archaeology.	It is clear from the evidence of the Characterisation Study that Barnet is not a homogenous urban form. We have clearly identified development typologies as our framework for protecting and enhancing Barnet's character. This will be taken forward in the Development Management Policies DPD and SPDs.	Add new section 10.4 on Barnet's heritage. Revise CS 5

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

						An additional failing of the current approach which is highlighted in this paragraph relates to the typological description given to Barnet. We would agree that overall Barnet is suburban in character but not exclusively. It contains a variety of density levels, building and townscape typologies as a reflection of its historic development. It is not a homogenous urban form as possibly implied in the current text. This variety and diversity of character needs to be carefully understood and reflected in the policy framework of the Core Strategy.		
4 4 7	3	Emma	Ford	London Fire and Emergency Planning Authority	General	<p>The LFB has identified the fire station in Finchley to be suitable for redevelopment. The fire station is now in a poor location following the removal of access to the North Circular Road some years ago, which affects access throughout the borough, and increases response time to emergency calls. As a result, the LFB will be seeking new suitable sites for the station to be relocated, and opportunities to redevelop the existing site. It would be useful for this to be considered in the future, and the LFB would welcome discussions with Barnet.</p> <p>The LFB is not currently represented on Barnet's Local Strategic Partnership (LSP), but understand a review will take place this year which should rectify this situation. The inclusion of the LFB on this board will allow the LFB to have a greater influence in relation to the fire safety to prevent issues at a later date. It will also bring greater opportunities on local strategic issues of this nature.</p>	<p>The Site Allocations DPD is the appropriate document for identifying new fire service facilities.</p> <p>The LFB should contact the Leader of the Council as chair of the LSP</p>	None
4 5 5	5	Mike	Dawson	Finchley Society	General	<p>Jargon is used all too often within DoT. When discussing various component parts of the LDF one part, say DoT, refers to another part, say Sustainable Communities Strategy (Sustainable CS), in justifying a linked strategy. Often these so-called 'linked strategies' are no more than what Barnet Council would like to happen but not a strategy.</p> <p>'In reviewing Barnet's DoT it is noticeable that this document lacks evidence in the text to support claims made in it. This made commenting on the document much more difficult because it was necessary to cross-reference it with other documents. Where evidence shows that claimed sustainable development is actually unsustainable, for instance, due to increased transport congestion, the solution is to say that solutions:</p> <p>"...are beyond the scope of the AAP...</p> <p>Or indeed, beyond the scope of the Core Strategy, DoT. Residents of Barnet deserve a Core Strategy that is tailored to their needs, not solely to the dictates of Regional or National Policy, or profit, as is often the case</p> <p>iv. Barnet has 20 main town centres. They are critical to the social, economic and environmental well-being of the borough</p> <p>v. research shows that whilst a number of town centres are thriving, others are vulnerable and face significant challenge</p>	A good Core Strategy is written in language that people can understand. It is important that the CS is clear and concise so that developers, the community, the council and its partners understand how the area will be changing, when it will change and what their role is. We consider that our priorities for Barnet over the next 15 years avoid the use of jargon wherever possible.	None
4 5 5	8	Mike	Dawson	Finchley Society	General	A spatial vision is set in Barnet's Sustainable CS and targets are set in the Local Area Agreement (LAA). However, the four themes and eighteen ambitions of the Sustainable CS are not a strategy showing how targets will be met.	Each policy in the Core Strategy will be monitored based on specific indicators and reported in the Annual Monitoring Report. This will provide clear evidence of policy delivery and a basis for review of the Core Strategy	Addition of monitoring indicators in Appendix B.
4 5 5	1 4	Mike	Dawson	Finchley Society	General	On heritage and the arts, we endorse what Mr Pickering said in his letter of 7th January on behalf of HADAS.	We refer to our response to HADAS at 460/1	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 5 8	1	Fiona	Henderson		General	<p>I would like to point out how difficult this consultation has been for members of the public to respond to. I did visit East Barnet library on several occasions and read through some of the documentation. However, it was not in a prominent place (it was upstairs in the study room) and it was in a box labelled incorrectly as 'historic (or listed?) buildings.' Also, the main document appeared to be missing at the start of the consultation period.</p> <p>Why is this so important? Because here in New Barnet we do have a viable redevelopment site (the gas works site) and we have two developers waiting in the wings to make planning applications – one for another site which would involve extensive demolition of the centre of New Barnet. As commented on p.6 of your document (item 3.23), there has been no public meeting in New Barnet even though it has been identified as a town centre. Given that the terminology in this document is not easily accessible, I do not think that this situation is at all satisfactory.</p>	We are concerned that you have had this difficulty and have written to the Head of Libraries about documents being easily available to the public during the consultation period and beyond.	None
4 6 2	1	MWG	Scott	Garden and Plant Centre Developments Ltd	General	<p>Paragraph 1.2.3 'The Core Strategy must also be shown to be viable and flexible so as to allow for future changes in circumstances'. This flexibility is not however apparent in paragraph 2.3.1, Strand 1 'Absolute protection of the Green Belt, Metropolitan Open Land and other valued open space from inappropriate development.' It would seem beholden on a rigorous LDF plan making process that all land zonings should be examined, in the light of changed circumstances since original Green Belt or MOL zonings were made. This is in the context of an overwhelming need to provide for the increase in housing requirements, particularly for affordable family dwellings.</p>	<p>The Site Allocations DPD is the appropriate document for site specific considerations including changes to MOL boundaries.</p> <p>We refer to our response at 462/1 on the Green Belt / MOL</p>	None
4 6 2	2	MWG	Scott	Garden and Plant Centre Developments Ltd	General	<p>Paragraph 2.1.1 states that there are four sustainable community strategies which inform the Core Strategy and these are:</p> <ul style="list-style-type: none"> <li>• ' Growing successfully</li> <li>• Safer, stronger and cleaner Barnet</li> <li>• Investing in children and young people</li> <li>• Healthier Barnet (including older people)'</li> </ul> <p>Paragraph 2.1.2 goes on to state that the spatial vision is as 'A successful city suburb'. Such a concept would imply the inclusion of quality low rise housing. The special qualities of suburban development are repeated throughout the Direction of Travel Document. This is in direct contrast to the proposed solution to the requirement to find new housing sites in Barnet which is that of a 'compact city'. This is interpreted in Policy CS1 as being the redevelopment (and consequent increase in density) of housing at:</p> <ul style="list-style-type: none"> <li>• Brent Cross - Cricklewood</li> <li>• Colindale</li> <li>• Mill Hill East</li> </ul> <p>These developments may be suitable for non-family households but would seem to deny the opportunity for families to access the lifestyle advantages of living in those high quality suburbs which are deemed desirable elsewhere in the Core Strategy. Yet the Themes and Ambitions, Core Strategy Objectives, and Core Strategy Policies, stated in Table 1 on page 21 of the Core Strategy repeatedly make reference to 'Providing quality homes and housing choice in Barnet', 'To promote strong and cohesive communities', 'To promote healthy living and well being'. If a more flexible view was taken of matching housing requirements with deliverable sites, including existing Green Belt and MOL Zonings, there would be the opportunity to offer suburban living to more families in need of such housing.</p>	Our preferred housing mix is supported by the sub regional Strategic Housing Market Assessment which helps determine the dwelling mix for new residential schemes including the provision of family accommodation.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 6 3	3	Chris	Nightingale	Friends of Barnet Market	General	<p>In order to appreciate why we wish to make the above changes, the background to the current situation regarding our market is given in the following: Chipping Barnet Market has been in existence for more than 800 years. It is a vitally important component of the town centre, both in terms of Chipping Barnet's identity and vibrancy and in terms of providing choice and quality at affordable prices. It is currently under threat - not just from the challenging economic climate but, unlike other markets in the Borough, its infrastructure has recently been removed (in order to carry out redevelopment which has not followed) and it has been left highly exposed (literally). The Market has moved back from its temporary home on the Stapylton Road Car Park to an empty site with a temporary hoarding around it, minimal services, no Waco's or washing facilities and an inadequate and temporary surface.</p> <p>As a result it appears commercially fragile and unattractive to its customers and is in grave danger of ceasing. We welcome the Council's support for the protection and continuation of the Market, but also strongly suggest the Council make special provisions within the forthcoming LDF Core Strategy to 'protect and enhance' this important local facility by committing to the preparation of a specific Planning Brief for the market site (to be adopted by the Council) which states that any redevelopment of this site must re-provide a full stalls market (covered or open) at least equivalent in size to what existed up to the time of the ill-fated move to the Stapylton Road car park. The current planning consent for the site expires in November 2010 and the above will ensure that any subsequent application includes provision of a market (whether or not the present one still exists).</p>	The Site Allocations DPD is the appropriate document for site specific considerations.	None
4 6 4	1	David	Howard	Federation of Residents Associations in Barnet (FORAB)	General	<p>Our first concern is that the document is too generic and does not sufficiently take into account the different characteristics of various parts of the Borough. The same documents prepared by Westminster and Kensington and Chelsea and Enfield Boroughs differentiate between various localities. They actively discourage certain types of development in one area while encouraging it in another. There is clear evidence that local councillors and communities have had an active part in drawing up proposals for each area with the intention of either maintaining the area as it is or stating what growth would be permitted or encouraged.</p>	The LDF is a folder of documents and the Core Strategy is at its heart. There is a clear spatial agenda through the Three Strands Approach which enables the Core Strategy to integrate the needs of places with the priorities that need to be addressed in Barnet. We are required to adopt a positive spatial strategy approach to DPD production and not reintroduce the 183 saved policies of the UDP.	None
4 6 4	3	David	Howard	Federation of Residents Associations in Barnet (FORAB)	General	<p>We are concerned that the language of the consultation document is most unfriendly to lay people and the consultation documents actively discourage reading and responses in the recommended format.</p>	A good Core Strategy is written in language that people can understand. It is important that the CS is clear and concise so that developers, the community, the council and its partners understand how the area will be changing, when it will change and what their role is. We consider that our priorities for Barnet over the next 15 years avoid the use of jargon wherever possible.	None
4 6 4	4	David	Howard	Federation of Residents Associations in Barnet (FORAB)	General	<p>While the officers have tried to encourage consultation it has been difficult for the average householder to understand the document as written or what it means for them. The Characterisation study which would attract more interest was arranged hurriedly for a small hand picked group of people and took less than two hours. Most attendees did not know what to expect or why they had been chosen.</p>	We consider that the Characterisation Study workshop in June 2009 was well organised with the clear aim of drawing on the knowledge of civic groups, such as FORAB. We are concerned that 'most' representatives of such civic groups did not understand what they were doing at the workshop.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 6 4	5	David	Howard	Federation of Residents Associations in Barnet (FORAB)	General	We also have concerns that there are discrepancies between the blue boxes containing the policies and the white explanatory text that precedes the boxes. The blue policy boxes are weaker than the previous texts. The policies are capable of multiple interpretation which will allow developers lawyers to interpret the policies in their favour. The more robust language of the white text should be used throughout to strengthen the policies.	The supporting text is more expansive because it sets the context for the policy. The text forms part of the development plan and is therefore a material consideration.	None
4 6 4	6	David	Howard	Federation of Residents Associations in Barnet (FORAB)	General	The document appears to have been based on the existing Zone One centric existing London Plan of Mayor Ken and does not appear to have regard to the more suburban orientated draft London Plan of Mayor Boris. The document should be amended to bring it line with the Mayors new London plan	We refer to our response at 471/7.	None
4 6 4	2 3	David	Howard	Federation of Residents Associations in Barnet (FORAB)	General	This document is an improvement on the Issues and options document but there is a considerable amount of further work required before we have a document that with implement the original three strands policy in Barnet. We urge you to carry out this review before the next version is published.	We welcome this acknowledgement and recognition that the Core Strategy is an emerging document and reiterate our earlier comments on the Three Strands Approach being an integral part of the place shaping of Barnet.	None
4 6 6	4 9	A	Reid	Mount Anvil Plc	General	8.2.3 refers to forthcoming Development Management Policies DPD and Site Allocations DPD. We await the publication of these documents to assess their content, however, following the Inspector's comments at appeal in relation to two proposals at 401-405 Nether Street, Finchley N3 1QG (LPA refs: F/00506/08 & F/00647/08) the site is clearly appropriate for a high-density residential-led mixed-use development and should be allocated as such in the Site Allocations DPD.	The Site Allocations DPD is the appropriate document for site specific considerations.	None
4 7 0	1			Government Office for London	General	Overall we believe that the document is progressing well. We are pleased with the brevity of the document and the limited number of policies. The layout of the document has much improved from your previous draft, although the document would benefit from an increased use of maps to illustrate policies and where change will occur in focussed areas, (particularly Mill Hill East, Colindale and Brent Cross Cricklewood). However, whilst Barnet's spatial concept is strong, GOL feel that this could still be communicated better, with more detail in the spatial policies and fewer thematic policies.	We welcome this support from GOL and have added new maps for the three growth areas and revised Policy CS1 to better communicate the spatial concept of Three Strands	Introduce new maps and revise CS1
4 7 0	2			Government Office for London	General	Section 5 and Section 6 of the document contain some important information on the issues facing the borough and set out the vision, objectives and overall spatial strategy for the plan period. We are pleased with the progress made on the spatial objectives which are clearer and more focused on Barnet's most critical issues and in many cases clearly measurable such as the enhancing and protecting of green and natural open spaces objective.	We welcome this support from GOL	None
4 7 0	3			Government Office for London	General	Clear linkage between evidence base and policy should be apparent throughout the Core Strategy. Appropriate referencing and listing of all evidence is therefore helpful. Wherever possible, we urge that the evidence base is complete prior to submission.	Agree	At the end of each policy section we have added a list of references
4 7 0	1 6			Government Office for London	General	If possible, it would be of help if key diagram and other maps showed names of town centres and locations of key public transport connections.	Agree	Revise Map 2

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 7 1	7	David	Howard	New Barnet Community Association	General	Paras 4.1, 4.3, 9.5, 2.7.3 refer to realigning the LDF to be in line with the new Mayors London Plan. This does not appear to have happened and should be done as Mayor Boris' Plan is more sympathetic than Mayor Kens Zone one centred document.	The publication version of the Core Strategy will consider the amendments proposed in the replacement London Plan but until that is adopted the existing London Plan is the document which the Core Strategy has to be in conformity with. Barnet's Core Strategy has clearly anticipated the Mayor's own direction of travel on the London Plan. It has highlighted the need to optimise rather than maximise housing density and to reflect local context, public transport accessibility and provision of social infrastructure. The Density Matrix in the draft London Plan (table 3.2) is the same as the one in the London Plan 2008. Higher density development is therefore not discouraged by the draft London plan which seeks to optimise the potential of sites. The draft London Plan clearly states that higher density provision for smaller households should be focused in areas with good public transport accessibility.	None
4 7 1	8	David	Howard	New Barnet Community Association	General	Para 4.4 refers to interim visits by the Planning inspector. His comments should be published for all to consider against the draft LDF.	A frontloading visit from the Planning Inspectorate took place in October 2009 and we will publish the note of the meeting at publication stage.	Publish note of frontloading visit
4 7 1	9	David	Howard	New Barnet Community Association	General	Para 6.2 the current It systems used to interface between the planning department and public is still not working correctly three years after being introduced thus excluding the public from finding out about planning applications and other proposals.	We intend to review the Statement of Community Involvement and this is an issue that can be addressed through that review.	Publish Draft LDS
4 7 1	10	David	Howard	New Barnet Community Association	General	Para 9.6, 4.1.2, 4.1.3 reliable versions (and in many cases any version) of the robust evidence bases are not available therefore it is unacceptable that the LDF should be used as a basis for consultation	We do make it clear what our LDF Evidence Base is made up of. We are required to make this publicly and freely available on our website	Publish evidence base
4 7 1	11	David	Howard	New Barnet Community Association	General	Para 1.3.1. 1.4.1 Where does the word minimum appear in the London Plan in respect of number of new homes in Colindale and Mill Hill East and 3,500 new homes at Mill Hill East.	Table 5B.1 on page 301 of the existing London Plan. Annex 1 on page 213 of the draft London Plan.	None
4 7 1	12	David	Howard	New Barnet Community Association	General	1.4.1 The development framework for Brent Cross Cricklewood is primarily the developer's expectations and did not include collaboration with the key stakeholders to wit the existing residents. The current proposals will not deliver a high quality sustainable development.	Development of Brent Cross Cricklewood has been subject to substantial community involvement.	None
4 7 1	14	David	Howard	New Barnet Community Association	General	Paras 4.2.2, 4.2.3 these do not acknowledge that areas such as New Barnet and Chipping Barnet were self contained separate "villages" out side London and have characters which reflect this. Although there was infill between them in the 20th Century they still maintain separate identities. The proposals for intensification along all the main roads will kill this identity and when the new retail premises are added will result in Clone town which could be anywhere in the UK. 'Para 4.7.2. Barnet already has too many retail outlets struggling to capture business and there must be some rationalization if the town centres are to survive. This means fewer shops not more.	We highlight the distinctiveness of Barnet's town centres in the Core Strategy and set out a framework for them to manage change and perform to their strengths. Major thoroughfares are no longer identified as having potential for residential infill	Revisions to Key Diagram, CS1, CS3, CS6, CS8 and supporting text
4 7 1	13	David	Howard	New Barnet Community Association	General	All 14 of the policies in the blue boxes need some rewording to beef them up so they reflect the text in the various preceding white text sections. At present they are woolly and open to multiple interpretations.	The supporting text is more expansive because it has to set the context for the policy.	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

4 7 1	2 6	David	Howard	New Barnet Community Association	General	<p>The present document, while an improvement on the first issues and options document, does not meet the needs of New Barnet in particular and will have a major negative impact on the wider community especially East and Chipping Barnet.</p> <p>All the incomplete and missing evidence bases and supporting documents must be produced so the whole picture can be seen in the round.</p>	<p>We welcome this acknowledgement and recognition that the Core Strategy is an emerging document and reiterate our earlier comments on the New Barnet Town Centre Framework being an integral part of the place shaping of Barnet.</p> <p>We refer to our response at 471/10 on the evidence base</p>	Publish evidence base
4 7 2	1	Jan	Chairman	NHS Barnet	General	<p>We support the overall approach of the Core Strategy, and particularly welcome references to joint working with NHS Barnet. The following comments are submitted jointly from NHS Barnet and NHS London Healthy Urban Development Unit (HUDU). Firstly, we would suggest it may be useful for the Council to review relevant HUDU documentation, including:</p> <ul style="list-style-type: none"> <li>• 'Health and Urban Planning Toolkit' which sets out a step-by-step approach to improve engagement between Primary Care Trusts and Local Planning Authorities and acts as a Handbook to integrate health into the Local Development Framework and the planning application process. (<a href="http://www.healthymbanddevelopment.nhs.uk/documents/engagement_toolkit/HUDU_Health_and_Urban_Planning_Toolkit_Main_Report.pdf">http://www.healthymbanddevelopment.nhs.uk/documents/engagement_toolkit/HUDU_Health_and_Urban_Planning_Toolkit_Main_Report.pdf</a>)</li> <li>• 'Watch out for health' which should be used at an early stage of pre-application discussions, project initiation, area action plan or masterplan stage to provide an overview and identify critical issues related to proposed development and its impact on health. The document outlines potential health benefits, positive and negative effects of proposed development and issues that need to be thought about. (<a href="http://www.healthymbanddevelopment.nhs.uk/documents/integrating_health/HUDU_Watch_Out_For_Health.pdf">http://www.healthymbanddevelopment.nhs.uk/documents/integrating_health/HUDU_Watch_Out_For_Health.pdf</a>)</li> </ul>	<p>We welcome the support from NHS Barnet.</p> <p>In terms of engagement we highlight the publication of the Engagement Agreement between NHS Barnet and the council as the local planning authority.</p>	New para 20.2.4 on the Engagement Agreement
4 7 2	5	Jan	Chairman	NHS Barnet	General	<p>We support the comprehensive vision for Barnet set out in paragraph 6.1.1, particularly references to encouraging healthy lifestyles, providing high standard public services, high quality of life and tackling multiple disadvantage. Again, reference to the need to tackle health inequalities would be welcome. We support reference to the four themes of the Sustainable Community Strategy (SCS), which include a healthier Barnet.</p> <p>We welcome confirmation of Barnet's SCS core objectives set out in section 6.2, including meeting social infrastructure needs and promoting healthy living and well being, and linking these objectives to the Core Strategy policies in Table 1.</p>	<p>We consider that tackling health inequalities is addressed by the objective of promoting healthy living and well-being. An amendment to the vision is therefore not required.</p>	None
4 7 3	1	BJ	McKenny	Whetstone Society	General	<p>Having attended both the Barnet Characterisation Study meeting (10th June 09) and the Civic Network Meeting (11th November 09) I find the whole subject of a long term vision for Barnet somewhat overwhelming.</p> <p>As one of the most diverse boroughs in the country, to achieve an overall strategy to cover all its requirements, including those of the GLA is no mean task.</p>	<p>A good Core Strategy is written in language that people can understand. It is important that the Core Strategy is clear and concise so that developers, the community, the council and its partners understand how the area will be changing, when it will change and what their role is. We consider that our priorities for Barnet over the next 15 years avoid the use of jargon wherever possible.</p> <p>'Consultation on the Direction of Travel included meetings and presentations to a wide variety of groups and stakeholders explaining what we were doing, why we were doing it and how they could get involved.</p>	None
4 7 4	3	G	Jardine	Greensquare Residents Association	General	<p>The Residents Association support the Core Strategy draft. We thank the local authority for providing to us an opportunity to make comment upon the Core Strategy draft and for inclusion in discussions relating to the same.</p>	<p>We welcome this support</p>	None

## Representations for Core Strategy Direction of Travel and Council's Response and Recommendations

480	22	Dorothy	Badrick	UKOSF	General	please consider the quality of life and living conditions and environment in cricklewood and childs hill	The Core Strategy is a borough wide document and considers quality of life across Barnet.	None
485	39	Robert	Shutler	Woodside Park Garden Suburb Residents Association	General	Sweeping statements such as the ones stated herein are very grand but will probably get quoted out of context meaning that all growth will be stifled and that the Government and Council will have total control over the population which is presumably what is behind all of this. This is just one step away from Stalinist Russia which also stifled all creativity and development.	Consultation on the Direction of Travel included meetings and presentations to a wide variety of groups and stakeholders explaining what we were doing, why we were doing it and how they could get involved.	None
488	1	Glen	Rollings	Greater London Authority	General	It should be noted that the targets for Mill Hill East and Colindale in the Consolidated Draft Replacement London Plan (up to 2031) set out updated figures which differ from those stated in paragraph 1.3.1. Colindale as an Opportunity Area is set with a minimum target of 12,500 homes and 2,000 jobs, whilst for Mill Hill East the figures are 2,100 and 1,800 respectively.	We have updated paragraph 1.3.1 and 1.4.1 to highlight figures in the adopted and draft revised London Plan.	Revise Sections 1.3 and 1.4
488	2	Glen	Rollings	Greater London Authority	General	The target figures within the draft replacement London Plan have not changed, but the timeframe of the plan is been extended to 2031	See response to 488/1	Revise Sections 1.3 and 1.4
488	3	Glen	Rollings	Greater London Authority	General	At paragraph 2.7.3 no reference is made to the draft replacement London Plan (October 2009). The Examination in Public is likely to be held later in 2010, after which the replacement plan will gain increased weight in LDF and policy formulation and decisions. It is important that the most recent and up to date policy is referenced in the Core Strategy to ensure its longevity.	We have updated the Core Strategy to reflect the review of the London Plan and have highlighted the timetable for its adoption.	Revise section 2.8 on London Plan
488	4	Glen	Rollings	Greater London Authority	General	At paragraph 2.8.1, the main report from the Outer London Commission has now been received. The document references the 'spoke and hub' concept	We have amended the section on the Outer London commission following the publication of the draft revised London Plan in October 2009.	Revise section 2.8 on London Plan
488	5	Glen	Rollings	Greater London Authority	General	Paragraph 2.9.1 sets out that the London Borough of Barnet is involved in co-ordinated working with relevant local authorities (e.g. Brent) and key agencies for the North West London – Luton Corridor links to Wembley. Transport for London seeks clarity on how this is being done in transport terms.	Joint working is achieved through day to day interactions and liaison on specific , schemes, projects and policies, and through the North London Strategic Alliance (NLSA), for example as mentioned in paragraph 14.6.2	None
374	1			A2 Dominion Housing	Vision & objectives	Our client notes the Council's vision and objectives which seek to manage housing growth and meet housing aspirations; to provide economic growth and prosperity and strong and cohesive communities; and to ensure efficient use of land through the promotion of mixed use development on previously developed land. In order to deliver this vision and these objectives, the delivery of housing in general and affordable housing in particular must be prioritised. Housing is particularly important to kick start regeneration and feed the vision of economic prosperity.	Housing has an important role to play in kick-starting regeneration of our priority housing estates. However commercial led regeneration is considered more appropriate to the regeneration of priority town centres and Brent Cross.	None
470	14			Government Office for London	Vision & objectives	Map 1 – Spatial context for Barnet – suggest including the areas of intensification and opportunity area as defined in the London Plan for Barnet as well as neighbouring boroughs.	Agree	Revise Map 1