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London Borough of Barnet
2 Bristol Avenue
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London NW9 4EW

Department: Planning
Our reference: LDF02/LDD12/LP02/DR01

Date: 9 August 2021

By email: nick.lynch@barnet.gov.uk

Dear Nick

Statement of general conformity with the London Plan (Planning and Compulsory Purchase Act 2004, Section 24(4)(a) (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local Development) (England) Regulations 2012

RE: Barnet's Draft Local Plan (Regulation 19)

Thank you for consulting the Mayor of London on the Regulation 19 document. As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments, which are set out below. Transport for London (TfL) have also provided comments, which I endorse and attach.

The Mayor provided comments on the Regulation 18 consultation in March 2020. This letter follows on from the earlier advice and confirms that the draft Local Plan is in general conformity with the London Plan 2021, which was formally published on the 2 March 2021 and now forms part of Barnet's Development Plan containing the most up-to-date policies.

This is welcome and we appreciate the work of your team and the collaboration with GLA officers. We have set out below a few detailed comments where the council should make just a small number of further amendments so that the draft local plan is consistent with the London Plan.

Housing

The draft local plan commits the borough to meet the London Plan's 10-year **housing target** of 2,364 homes per year. These will be concentrated in the borough's Opportunity Areas, Growth Areas and District Town Centres, and this is welcomed.

The draft plan sets out a delivery target of 5,100 homes on small sites by 2036. This equates to 340 homes per year, below the London Plan 2021 target of 434. The intention to prepare a specific Design Code for Small Sites as part of the Sustainable Design Guidance SPD is supported. In the interim the borough should refer to the GLA's draft Good Quality Homes for All Londoners LPG and specifically Module B on small sites.

The draft plan should mention the 50% **affordable housing threshold** for public sector land and loss of industrial land or reference the relevant London Plan policies, as these affordability levels could potentially be viable. This would also be useful, as some explanations within the draft plan lack clarity without such references. Paragraph 5.4.10 also appears to be inconsistent with LP2021 Policy H5 C in that all the criteria must be met to follow the Fast Track Route.

The West London Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2018) found no current or future need in Barnet for pitches and plots, and the Council has confirmed that it will work with the Mayor on the London-wide Gypsy and Traveller accommodation needs assessment. In the interim the borough should work with adjoining boroughs to consider if sites in Barnet could contribute to meeting their identified needs.

Town Centres

Policy GSS02 and its supporting text set out a long-term strategy for the Brent Cross Growth Area, including how it can support the creation of a new Metropolitan Town Centre at Brent Cross Town. This supports London Plan Policy SD8 and the identification of Brent Cross as a future Metropolitan Town Centre.

Opportunity Areas

The Plan includes specific policies for the Opportunity Areas identified in the London Plan. The Mayor supports Barnet's intention to work with the adjoining boroughs on a planning framework for New Southgate. In order to be consistent with London Plan policy D9, the boundary of any areas in New Southgate that are appropriate locations for tall buildings must be set out in a development plan document. The GLA and TfL would be happy to work with the boroughs on scoping a potential planning framework for the area.

Tall buildings

GREATER LONDON AUTHORITY


The Mayor notes that Barnet defines a category of 'very tall' buildings of 15 storeys or more in Policy CDH04. It would be helpful if the policy clarified if the appropriate locations for 'very tall' buildings is the same as for tall buildings, or is a sub-set of those locations.

Transport

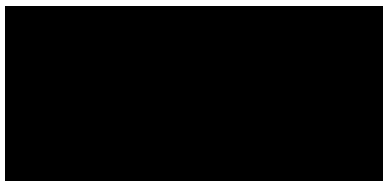
The plan supports the West London Orbital rail scheme, setting out areas where this scheme could be a catalyst for growth. The plan could adopt a more cautious wording about its delivery to reflect the fact that the scheme remains unfunded at the present time.

The parking standards in the plan conform with the London Plan and this is welcomed. The accompanying text and site allocations will need to be updated to reflect this approach. In particular, references to parking 'requirements' or 'needs' should be further qualified and related only to disabled persons parking and operational parking. Although the reliance on assessing orbital travel has been modified slightly, TfL continues to have concerns about such a connectivity measure that could be used inappropriately and also open to challenge.

Next Steps

The Mayor, through the GLA, looks forward to continuing to work with the council as the Local Plan moves towards examination. If you have any questions regarding the comments in this letter please contact Darren Richards 

Your Sincerely



Lucinda Turner

Assistant Director of Planning

Cc Anne Clarke, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG

From: [Natalie Gordon](#)
To: [Thomson, Ngaire](#); [Feldman, Lesley](#)
Cc: [Hassan Ahmed](#)
Subject: FW: Current and future policy re M4(2)
Date: 21 September 2021 10:34:06
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.jpg](#)
[image004.png](#)
[image005.jpg](#)
[image006.jpg](#)

** Warning External Email **

Hi Ngaire and Lesley

Thanks a lot for contacting us and I'm so sorry for my delay in getting back to you.

Please find the following suggested additions in blue to Barnet's [draft policy](#) CDH02 Sustainable and Inclusive Design (p104 – 106):

'f) All residential development is required to meet [as a minimum](#) Building Regulation M4 (2) 'accessible and adaptable dwellings', [unless exceptional circumstances apply](#).

Add to supporting text:

[In exceptional circumstances the provision of a lift to dwelling entrances may not be achievable. In the following circumstances – and only in blocks of four storeys or less – it may be necessary to apply some flexibility in the application of this policy:](#)

- [Specific small-scale infill developments \(see London Plan Policy H2 Small sites, which notes: 'Homes that are not on the ground floor on minor developments can comply with the M4\(1\) standard, which does not require step-free access, where provision of step-free access would be unfeasible.'\)](#)
- [Flats above existing shops or garages](#)
- [Stacked maisonettes where the potential for decked access to lifts is restricted](#)

[If it is agreed at the planning stage \(for one of the reasons listed above\) that a specific development warrants flexibility in the application of the accessible housing standards M4\(2\) and M4\(3\), affected dwellings above or below ground floor would be required to satisfy the mandatory building regulations requirements of M4\(1\) via the Building Control process. M4\(2\) and M4\(3\) dwellings should still be required for ground floor units.](#)

g) All major residential developments are required to provide 10% of new units as 'wheelchair user dwellings' in order to meet Building Regulation M4 (3).'

Just to note also, you can only apply one standard to a dwelling – a dwelling either complies or it doesn't – under the Building Regulations.

I hope this helps. If you have any further questions, just let me know.

Best wishes,
Natalie

Natalie Gordon (she/her)
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[london.gov.uk](#)