The Finchley Society
Founded 1971

We care for Finchley and Friern Barnet

CONSERVE • ENHANCE • INFORM • EDUCATE

# Response to Draft London Plan 2027-36

# From The Finchley Society

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# Introduction and background

## *Introduction*

The Finchley Society welcomes the opportunity to take part in the consultation on the draft London Plan 2026.

Our main concerns about the draft plan are to:

- ensure that London has a thriving economy with sufficient and varied job opportunities;
- ensure that the infrastructure can support the resident population, those who travel into the city to work and visitors – whether from elsewhere in the UK or from abroad;
- ensure that housing is appropriate for the needs of the population;
- limit development on the Green Belt, whether for commercial or residential uses;
- support the creation of vibrant and safe high streets and town centres; and that
- there is too much focus on inner and central London with insufficient understanding of the characteristics of the suburbs and their offer of a choice of lifestyle, different from inner and central London, that must be preserved to maintain a diverse population.

We were also surprised that there is no policy on noise pollution.

## *Background*

The Finchley Society (the Society) falls wholly within the London Borough of Barnet (LB Barnet) and is a London Amenity Society whose purpose and objects are:

*The Society is established for the public benefit for the following purposes in the area comprising the former Borough of Finchley and the Urban District of Friern Barnet which shall hereinafter be referred to as "the area of benefit".*

(a) *To stimulate public interest in the area of benefit.*

(b) *To promote high standards of planning and architecture in or affecting the area of benefit.*

(c) *To secure the preservation, protection and improvement of features of historic or public interest in the area of benefit.*

(d) *To promote, preserve and protect all green spaces in the area of benefit with particular regard to achieving and maintaining an acceptable and healthy balance between the natural and the built environment.*

(e) *To encourage and promote a healthy environment for the public in the area of benefit and raise awareness of local environmental issues.*

The area of benefit is the pre-1974 boundaries of Finchley District Council and Friern Barnet Urban District Council. This covers the current Wards of Finchley Church End, North Finchley, East Finchley, West Finchley, Hampstead Garden Suburb, Friern Barnet, Whetstone and a very small south-eastern section of Totteridge and Woodside. Throughout this submission where we refer to 'the area of benefit', it is these Wards to which we are referring.

To fulfil the objects of the Society the Planning Committee of the Society (the Committee) has developed a good working relationship with the Planning Officers of LB Barnet and the relevant Councillors. Our Chair is also Vice Chair of the Barnet Green Spaces Network (BGSN).

The Committee reviews weekly the new planning applications within the area of benefit and comments as appropriate. While most of these are for small householder applications, many within permitted development, there have been some large schemes in the area of benefit, and we are expecting more in the coming months.

The Committee is not against development, but we are keen continue to give Londoners a choice between different environments, offering different lifestyles, within London. Hence, we try to maintain the differences between the characters of central, inner and suburban London.

## *Finchley and Friern Barnet*

This section gives some background on the area.

#### Transport

Not all of Finchley and Friern Barnet has good transport links. PTALs range from 1 to 6. The Northern Line continues to be very crowded and new developments approved in Chipping Barnet and Finchley will add to pressure on the line.

#### Physical character

Much of the area of benefit is two and three storey housing built in the Victorian, Edwardian and post WW2 eras. There are also newer developments of low-rise flats and many conversions of larger houses to flats and HMOs. More can be found in the LB Barnet Characterisation Study, see: Characterisation study of Barnet: Sections 1 & 2, May 2010 and more specifically to the area of benefit: Characterisation study of Barnet: Sections 4 & 5, May 2010.

#### Socio-economic demographics

From the ONS Middle Layer Super Output Areas (MSOAs) for the area of benefit it can be seen that while some MSOAs are quite wealthy, others are relatively deprived. For example, in West Finchley nearly 60% (58%) of residents work in Senior and Professional positions, while in all the other MSOAs nearly half (48%) work in lower-level occupations. In West Finchley just over a quarter (28%) of households are deprived on one or more dimension, whereas in North Finchley over a third (35%) are.

The area of benefit is also very mixed in terms of ethnicity and religion. The majority classify themselves as White but there is a sizable population of Asian residents. Nearly a third (30%) of Finchley Church End Ward residents are Jewish and 12.5% of residents in Woodhouse Ward are Muslim. Many other religions are also represented.

## *This submission*

The remainder of this submission is structured around the format of the draft London Plan. Where we have no comments, the heading has been removed.

This document makes many points that we believe are pertinent to the wider London Plan and we have commented on these. However, where specific geographical areas or locations outside Finchley and Friern Barnet are mentioned, we do not comment, believing that it is more appropriate for residents in those areas to respond.

# 1 Overview of the Plan and Good Growth objectives

## *Introduction*

This chapter is more of a discussion document, and we offer only limited comments.

## *Good Growth*

The provision of sufficient and secure infrastructure is vital. Currently transport, mobile and water infrastructure in particular are inadequate.

## *Setting the target*

We are pleased to see that the Greater London Authority (GLA) has made its own estimates of housing targets, given the feasibility of delivery.

## *Managing adverse impacts*

It is crucial that the need for more housing does not result in damage to an already depleted natural environment or the building of the slums of tomorrow. An unintended consequence must not be reduced standards and the creation of homes that are uninhabitable in summer.

# 2. Making best use of land and achieving Good Growth

## *Introduction*

Our key points relate to new developments and the importance of acknowledging local heritage outside central London.

We are unconvinced that the LB Barnet needs to build housing on the Green Belt within the LB Barnet as it is currently exceeding its housing targets.

With respect to new developments, we would welcome extra support for LB Barnet in developing masterplans and design codes.

Some parts of the area of benefit are suitable for tall buildings up to 10 storeys. However, suburban locations, such as the LB Barnet, which offer an alternative to high rise flat living in inner London, should be supported by the GLA in refusing metropolitan high rises. All utilities, especially the removal of wastewater and transport infrastructure must be able to cope with new developments.

Importantly, new developments must be prevented from creating heat islands.

We are disappointed that local heritage outside central London is ignored.

## *MBUL1 Spatial strategy*

Figure 2.1 shows a need for the LB Barnet to build on the Green Belt and Table 3.1 identifies that the LB Barnet be required to build 7,000 homes on green land – perhaps not necessarily Green Belt. However, the LB Barnet has allocated enough sites to meet its target housing without the use of Green Belt land, and as identified in Appendix E, it has yet to fully exploit capacity of Brent Cross.

Development management and plan-making A (5) allows for exceptions to the requirement of prioritising affordable housing provision and public transport in developer contributions set out in A (4), if in the early phases. There is no guarantee that the later stages will deliver the promised affordable housing and transport. Ideally these should be in first phases.

## *MBUL2 Optimising the use of land and site capacity*

Design codes should be developed together with the local community and in advance of developer involvement in a site. We suggest that Design Panels are extended to include developing design codes together with the local community for specific sites. However, the LB Barnet has indicated that it has insufficient resources to develop design codes and masterplans. What allowance has been made to ensure LPAs have the capacity to do this?

It is essential that heights, etc. and densities are set independently and in advance of any developer involvement and then adhered to when assessing planning applications. If densities are set as in table 2.1 it should not be acceptable to exceed the heights and densities expressed if those have been properly assessed with due regard to the area, characterisation, transport, etc.

From the context map 2.5 it looks like Finchley is predominantly designated as outer suburban with some inner urban terrace. New developments should reflect the LB Barnet's characterisation studies that were produced in 2010. (See MBUL3 tall buildings. SAM levels on the data map. Finchley appears to have SAM levels ranging from 5A to 3.) https://www.barnet.gov.uk/planning-and-building-control/planning-policies-and-local-plan/local-plan-our-development-plan-1

Paragraph 2.37 suggests boroughs, if they so wish, issue a local design code for small sites. The Small Sites Design Code is now out for consultation. This should become essential and LAs must have the resources to comply.

Paragraph 2.33 allows use of podiums for car parking but asks that building frontage is kept active. In practice this means single aspect homes bolted onto the side of the podium adjacent to car entrances and often bin stores. This does not make for good living or healthy homes. Podiums should be avoided.

## *MBUL3 Tall buildings*

Tall buildings are defined as 30m and above and metropolitan tall buildings as 100m or more. With reduced ceiling height these could be 10 storeys and 33 storeys or more respectively.

LPAs are required to identify locations where these are suitable. Plan-making A (1) requires LPAs to "undertake an assessment and identify areas that are more or less sensitive to tall buildings". This is vague and therefore redundant. A (2) requires specific locations for tall buildings – an area either is or is not appropriate, and LPAs are best placed to identify these areas. Developers would use A (1) to propose increasingly inappropriate locations.

Most of the metropolitan tall buildings identified in the draft plan in Figure 2.8, are in central London. Development Plan 1) and 2) states that these buildings should be in specific places identified in Table 2.2, but this does not appear to stop the LB Barnet from identifying suitable locations. 'Should' needs to be strengthened to 'must', and the decisions on locating these areas should be taken together with local communities.

Development Management A (3) should be removed. "[I]f a tall building is proposed outside of a location identified in a local plan or in Table 2.2". Allowing proposals outside specified areas makes the specification irrelevant and effectively unenforceable. Also "Robust justification is expected for any conflict with these criteria." should be removed – it allows for unquantifiable subjective argument about what is 'robust'.

Development plan 4) implies that taller is acceptable if certain criteria are met, thereby over-riding the positioning requirement in Table 2.2. In Finchley we have experience of this where an inspector for the local plan specifically excluded some sites that the LB Barnet wished to include for tall buildings. The developer went ahead with plans for tall buildings and the GLA overruled the inspector, allowing the tall buildings in the planning application. The LPA seems powerless to implement their own, up to date, local plan. The London Plan should support the LPAs and not allow overruling in this way.

In paragraph 4ii) to emphasise the criteria, reword "Make a positive contribution to the existing and emerging skyline where a building is prominent and not cause unacceptable harm to local or strategic views" to "Where a building is prominent, make a positive contribution to the existing and emerging skyline and not cause unacceptable harm to local or strategic views"

In paragraph 4 (xi) remove "in the most prominent tall buildings in London," as this is too subjective and wide-ranging – the LPA can best define appropriateness in its borough.

Box MBUL3 2 and vii appear to be contradictory and should be reconcilled.

In paragraph 2.49 "can support" should be "can provide support".

In Table 2.2, cluster specific guidance, the guidance is too vague. Identifiable specific boundaries should be defined that fully enclose the identified location. Otherwise, developers will attempt to over-extend into inappropriate areas.

## *MBUL4 Utilities – capacity, connectivity, and resilience*

For large developments, MBUL4 should highlight the requirement for developers to specify the increased demand on utilities their developments will require, and to liaise with utility providers to ensure sufficient capacity exists or will be provided.

## *MBUL5 Sustainable Transport to Enable London's Growth*

Point 2 in the box needs to clarify who is doing the mapping. If it is the LPA, as could be logical, then ensure the resource is available. The LB Barnet is well behind other boroughs in providing a cycling network.

Lifestyle changes since the last London Plan mean that there needs to be an assessment of likely delivery van movements for all new housing developments and how these will be accommodated. Currently these are not assessed at all. With a sharp reduction in parking and push towards less car ownership and usage there will inevitably be an increase in need for home delivery.

Paragraph 2.83 references the need to reduce freight and light goods vehicles and the requirement to provide the 'necessary infrastructure' but does not say how. One consequence of excessive density on a site is the requirement for many delivery vehicles, particularly when the homes are not provided with all the essential shops in a close walking range.

The design code, as required under MBUL2a, must require provision of essential services and shops when they are not already within an 800m distance of the development.

MBUL5 removes the ability of LPAs to specify residential parking allocations that are relevant and appropriate to their boroughs – this should be reinstated. A London-wide specification, seemingly geared to inner city living with limited space and good public transport, is not appropriate to the suburbs. In the suburbs public transport is less available (particularly radially across the LB Barnet), distances to amenities are greater, and some private car parking is essential, especially but not only for the elderly, those with young children and the less able. It is not feasible to lug the weekly shop home or ferry children to after school activities (such as swimming lessons) on the bus.

MBUL5 requires a great deal of consultation with TfL, who are currently not staffed to handle this. Without more and well-trained staff, development proposals will be held up unnecessarily.

## *MBUL6 High-quality design for a growing, changing city*

Appropriate measures to reduce negative impacts and ensure high-quality build should include the distances between buildings especially those over four storeys. Tall buildings grouped closely together will form a heat island. See: *Hot property: how planning can help Londoners beat the heat,* GLA Planning and Regeneration Committee, August 2026.

Buildings close together increase overlooking and therefore increase the feeling of being watched, which is not good for mental health. They also create shade and some homes will therefore receive much reduced daylight and sunlight, particularly in winter, also negatively impacting mental health.

## *MBUL7 London's Heritage*

This section reflects one of our overriding concerns, namely that the draft plan is too focused on central London and does not take into account the differing contexts of the suburbs. It seems that the amount of text devoted to the World Heritage Sites is out of proportion; very few boroughs have such sites who will find the paragraphs relevant to them.

While the draft plan refers to internationally significant heritage assets it makes no reference to local conservation areas, local heritage assets or locally listed buildings. These should be recognised as important local assets, helping to define local areas, that need to be maintained.

Within the area of benefit lie some Archaeological Priority Areas and we are happy in particular with the importance the draft plan attaches to such areas, and with the encouragement of 'local heritage lists', which the LB Barnet has. It should be clear however, that the list should not be limited to heritage assets of archaeological interest in the narrow sense of archaeology. We would like the phrase 'of national importance' to be replaced by 'of local or national importance'.

There are conservation areas in every borough, and we should like to see encouragement, or stronger, of local authorities to consider whether to designate new ones, to keep watching over existing ones with a view to their enhancement, and to bring in the local community and people with relevant expertise by supporting and consulting Conservation Area Advisory Committees

## *MBUL8 Inclusive design*

This is welcomed but must work with that set out in HN9 and HN8. The minimum width of corridors stated does not allow for inclusivity and must be increased.

There needs also to be emphasis on the future lived experience of homes bearing in mind that the quality of this will impact both the physical and mental health of residents. The LPA should say what mix of homes they need. In the LB Barnet's assessment there is a need for family housing with three and four bedrooms, that is not being met in the new developments coming forward. The LB Barnet Local Plan, 2021-2036, Table 7, states that 40% of market homes should have three bedrooms and 25% four bedrooms and for affordable housing 40% should have three or four bedrooms.

## *MBUL9 Healthy streets and public realm*

We very much welcome this set of policies. Our experience in Finchley is of poor pavement conditions, much pavement clutter, no dedicated spaces for dockless bikes, and no public toilets other than one in the Arts Depot in North Finchley. However, we question the ability of the LB Barnet to be able to provide and maintain these policies.

# 3 Delivering the homes and neighbourhoods Londoners need

## *Introduction*

Our main points in this chapter are:

- building on the Green Belt should be a last resort and is not necessary in the current circumstances in the LB Barnet;
- larger developments should have mixed tenure to support mixed communities. Off-site provision of non-owner occupation accommodation should only be allowed in extremis; and
- small flats may help meet targets, but they will not relieve the pressure on temporary accommodation in the LB Barnet (or indeed in other places). Developments must take full account of housing need as assessed by the relevant LA.

## *HN1 Increasing London's housing stock*

The Plan's housing target for the LB Barnet is 32,849, split between 25,730 on brownfield sites and 7,000 on greenfield sites. This despite the GLA stating that it has resorted to building on the Green Belt only where necessary and that the LB Barnet has met its housing targets without having to resort to greenfield land. Building on greenfield, whether within or outside Green Belt, should only be considered if LAs do not have sufficient brownfield sites.

## *HN3 Delivering affordable housing*

The LB Barnet is in Location Band C of the Threshold Approach for market sale and build to rent, i.e. 20% affordable as a minimum. Offsite provision should not generally be allowed as a mix of tenures ensures a balanced community. Developments should be required to deliver these in the first phase to avoid any changes in circumstances reducing the inclusion of the target on site. Where offsite provision is the only option the viability of the scheme should be robust and offsite provision accepted.

## *HN4 Gypsy and Traveller Accommodation*

The provision of Gypsy and Traveller sites in densely populated urban areas is difficult. As of 2025 the LB Barnet has no permanent, council-managed sites, although a private family site off Mays Lane in Arkley was granted permanent planning permission on appeal in 2025. (*High Court backs approval for two travellers' caravans in a Mays Lane paddock once used for grazing horses*, The Barnet Society, 1 May 2026).

Given the disruption to residents and the cost of dealing with unauthorised traveller encampments, we support the provision of such sites, although whether the LB Barnet will be able to meet the target of 16 sites in a reasonable timescale and whether the urban area of benefit has suitable space, are debateable.

## *HN5 Managing specialist accommodation*

Table 3.6 proposes that the LB Barnet provides 2,127 Purpose Built Student Accommodation bedspaces. These places must be easily and cheaply accessible to places of study.

## *HN7 Housing size mix*

The proposals are not going to help the London housing crisis and reduce the numbers in temporary accommodation. Of the 3,031 households in temporary accommodation in the LB Barnet at the end of March 2026, 58% had dependent children (1,726 households). Of these households, 51% contained only a single adult, mostly women (94%). (https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness.)

The LB Barnet Local Plan, 2021-2036, Table 7, states that 40% of market homes should have three bedrooms and 25% four bedrooms and for affordable housing 40% should have three or four bedrooms.

London cannot be described as a single housing market. It is widely acknowledged that London is a series of villages, each with its own character and communities, and proximity to relatives, friends and familiar facilities is important for some people. Hence, we disagree with the assumption that one and two bed accommodation is needed equally across the whole of London. The Plan should therefore only challenge LPA assessment of housing mix where that is clearly not based on local housing need so that specific local need is the basis for development. Such an approach is also likely to generate less resistance among existing residents.

GLA studies (especially *A London for every child: Reversing the city's declining child population*) show that parents and potential parents believe that there is a lack of suitable accommodation and play space for families with children or those planning to have children. This goes beyond the number of bedrooms as generally families prefer to raise their children in areas of houses with gardens, or even flats with gardens. Generally, such accommodation is in the less densely populated suburbs. It is vital that London provides such accommodation to prevent young families leaving London.

Small flats may help to meet targets but any policy that focuses on small flats, forcing residents requiring three or more bedrooms to move out of the capital, does not lead to good growth, nor does it meet the LB Barnet's assessed need. The report cited above shows that there is concern among legislators that the number of children living in London is falling and the negative implications of this.

> Hina Bokhari OBE AM, Chair of the London Assembly Economy, Culture and Skills Committee, said in response to the report:
>
> *"Children and young people are essential to London's vibrancy as a global city. Providing the right conditions for children to flourish as they grow up and choose to remain here as adults is essential to the city's long-term economic, social, and cultural dynamism, which further benefits the rest of the country."*

One-bedroom flats may be 'popular' because they are seen to be affordable and a first step on the home ownership ladder. However, developers are finding it hard to sell one-bedroom homes in London. Single people and couples may need a second bedroom for a range of reasons including: working from home; space for carers or separate bedrooms in times of sickness; family support with childbirth; and maintaining relationships with friends, etc. All of which is important for good mental health. Additionally, a family with two children of opposite genders will need three bedrooms for privacy and in some cases for cultural or religious reasons.

The elderly may be deterred from downsizing from family accommodation because of the lack of alternatives with sufficient living space, number of bedrooms for grandchildren to stay and lack of outside space. Currently there is very little being built that will provide an incentive to downsize from the existing family home with a garden.

With the space standards so low (the lowest in Europe) it is imperative to provide the extra room. If space standards were more generous, and kitchen/dining spaces were separated from living rooms then the presumption of one and two bedrooms might be acceptable, but that is not what is being built.

## *HN8 Housing design*

Development management 1. The provision of dual aspect dwellings should be the only acceptable design for the reasons set out in paragraph 3.107. Single aspect dwellings do not address these needs. Moreover, the supposedly 'private' space of single aspect dwellings will be overlooked and therefore not genuinely private. Flats overlooking busy roads will provide no respite from road noise. There is always a design solution to avoid single aspect. See also GHR4 B (2) removal of heat via openable windows creating cross ventilation.

Development management 5. Internal circulation spaces should always be naturally lit and ventilated. Corridors should be at least 2m wide.

Development management B 2. The lowering of the ceiling height to 2.4m is a retrograde step and the implication that 25% of the home can be lower than 2.4 metres with no minimum set is not acceptable.

The higher height was introduced as a recognition that London is a heat island, and a higher ceiling will help towards air movement and keeping cooler. (See also ch5 5.5.) There have been six heatwaves this summer in 2026 and it is clear that designing to include passive ways of minimising heat build-up in homes is essential. ONS statistics show that "nearly all English regions, and Wales, experienced an increase in relative mortality risk of at least 50% at temperatures exceeding 24 degrees Celsius; the South-East had a 40% increased relative risk, which may be because of the region's population demographic". (https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/climaterelatedmortalityenglandandwales/1988to2025)

Development management B 4. The proposal on private outside space is too small, and 1.5 metres minimum depth makes the space unusable. Where a dwelling is single aspect and facing a street, particularly at ground level, this space will not be at all private. Another reason to prevent single aspect dwellings.

Development management C. Communal outside amenity space must include trees for shade and health reasons. The spaces should be large enough to accommodate residents who are likely to use this and not be divided into small pieces of land, nor double as active play spaces, which should be provided close by. See5/5.7.

Development management E. Annual costs and frequency of servicing should be clear from the outset and set for the first 10 years.

# 4. Growing London's economy in a way that benefits all

## *Introduction*

The Finchley Society acknowledges the importance of creating space for industry and commerce in the LB Barnet. The LB Barnet has a good road network connecting the borough to the North. However, the area of benefit contains some prime residential areas which it is important to retain to maintain the tax base and to help ensure a mix of communities.

Nevertheless, we are concerned about the restriction placed on converting commercial property to residential. In our view, some conversion of retail in high streets to residential could be beneficial.

We strongly support the development of a 'better' and more supported nighttime economy. The LB Barnet's high streets contain a mix of entertainment offers without the necessary infrastructure to support them. However, there is too much emphasis on pubs and not enough on maintaining other offers such as cafes, to open in the evenings. Some 12% of the LB Barnet residents are Muslim (ONS 2021 Census) and there are other communities that would prefer options other than pubs.

More thought should be given to the provision of public toilets to support this economy, especially after venues close.

## *GLE1 Sufficient and appropriate employment space*

Paragraph 4.12 positively encourages the use of Article 4 Directions to restrict commercial to residential. This is too broad. Reduction in some commercial space, should indeed be restricted to maintain a diverse range of employment.

The presence of housing in high streets can result in better quality and safer high streets. There are issues of noise for residents, but building and wider urban design can mitigate this and there is likely to be a demand from some sections of the community to live in these generally highly accessible locations. This must, of course, be balanced with other commercial uses that benefit high streets such as cafes, restaurants, sports facilities, children's nurseries and other community spaces. We would therefore welcome clarification on policy 4.12 on when commercial to residential permitted development rights should be removed in town centres.

We support policy GLE1 A to require local plans to provide for wide variety of stakeholders at different price points.

We support policy GLE1 B that Class E developments must be designed flexibly for future business and, importantly, community needs.

We support policy GLE1 E restricting changes in use to balance local need and avoid overcapacity of one-use class.

We believe that policy 4.13, that sufficient "back of house" space in shops is desired, must be strengthened. Within our area of benefit extensions to the living accommodation behind and above shops is resulting in lack of access for refuse to be stored and removed from shops. Rubbish is then stored on the street, causing street clutter and potentially creating hygiene issues.

## *GLE2 Supply of industrial land*

Only a small part of the area of benefit is Green Belt but policy GLE2 E raises concern. Not least because the area might be considered as the most accessible part of the Green Belt. In an area that is mainly built-up, Green Belt land is valuable for the health of the population and the environment.

Policy 4.28 might clarify how LPAs are to reconcile demand for housebuilding and existing residential areas, with demand for industrial land. We believe that designations must be done in collaboration with residents and their representatives, including councillors and voluntary groups.

## *GLE3 Data centres*

We welcome policies GLE3 D/E/F/G on the placement of data centres. However, there should be guidance on the number and proximity of centres to each other to prevent an area trying to support too many.

Policy 4.36, the proximity of data centres to industry, allows for more efficient industry. They should therefore be included in the definition of industrial land. The two should work in synergy. A data centre miles away from any use risks wasting London's heat and precious land capacity.

Policy 4.38 should include using data centre excess heat for community heating projects.

## *GLE4 Night-time economy*

We support policies GLE4 A and B and the development of a nighttime economy accessible and safe for a wide range of people. However, we would like to see stronger protections for those living nearby, especially as more housing is located in high streets.

With respect to GLE4 B we appreciate the acknowledgment of night workers - including those commuting to CSAs from outer suburbs - and their support via late-night shops, cafes, toilets and places of shelter in policy subsection B (3). To this should be added transport, both public and private such that there is provision of car parking close to venues for staff. This is especially important for women leaving work late in the evening. Toilets should be available to users of nighttime venues outside the venues, especially for use once venues close, to prevent urination on the streets.

We would also like to see greater promotion and understanding of schemes such as 'Ask for Angela' by both venue staff and their customers with appropriate support in place for those requesting help and those providing it.

## *GLE 5 Culture and creative industries*

There is little to disagree with in the culture section, though there may be rather too much concentration on pubs. Coffee bars and the like have similar functions during the day but usually close very early in the evening or even in the afternoon. We would welcome polices to support longer opening hours for outlets like cafes and other venues not focused on alcohol, although some might be permitted to sell alcohol at certain times to broaden their later opening hours clientele.

This section is focussed on private sector or in some cases public sector commercial/professional activities, treating the public as consumers of culture. This does not recognise the effort of private individuals and voluntary societies which provide, for example, concerts, talks, community meetings, etc. At the least LAs, pubs and other venues could be encouraged to make venues available to community groups for no or very low charges.

We support policies GLE5 A&D. We agree to protecting existing clusters of cultural uses and facilities as part of regeneration and agree that developments should provide at least an equivalent amount of cultural space with similar affordability.

With respect to policy 4.47, it could be useful to provide some weighting principles for LAs when determining whether to grant licences for late night cultural activities which could impinge on residential properties in town centres.

We agree with policy 4.55 that supports existing cultural providers having right of first refusal to replacement cultural services, so the cultural offers are not lost post-development.

We strongly support policy 4.56. It is essential that Equalities Impact Assessments are carried out when protected groups are at risk of exclusion from development proposals.

## *GLE6 Visitor infrastructure*

Policy GLE6 E, the requirement for serviced visitor accommodation requiring 10% wheelchair accessible and 15% accessible appears to come from research to support the 2012 Olympics. We question whether this standard needs to be revised.

## *GLE7 Affordable workspace*

With respect to policy GLE7 D we have concerns that off-site provision of affordable workspace will be rendered less affordable owing to transport costs and accessibility. Should there be inclusion of funding principles in this policy, to support use of off-site affordable workspace?

In policy 4.66 we support long term commitments to affordable workspace which is another option for increasing vibrancy in town centres and high streets.

## *GLE8 Access to employment and skills*

With regard to policy 4.74, we accept boroughs may not have constant building projects, so we support policy to encourage cross borough training. This requires TfL to consider transport issues from east to west between adjacent boroughs, such as between the boroughs of Barnet, Harrow and Enfield. The price of travel may also be an issue.

## *GLE9 Aviation*

Section F includes Advanced Air Mobility, which incorporates drones and electric vertical take-off and landing vehicles. It would be useful to have more clarity on the London Plan approach to the use of these for deliveries in lieu of traditional motor vehicles.

## *GLE11 Circular economy*

We support policies GLE11 A/B/C that aim for proposals to be net zero waste at construction stages and appreciate the detail in B and C on how this should be delivered.

We appreciate the detail on circular economy principles in policy 4.94.

## *GLE12 Waste*

A high percentage of Finchley's waste is included as part of the LB Barnet's waste to the North London Incinerator. Should policy 4.109 include some reduction targets/penalties, in order to reduce this amount of waste?

## *GLE 13 Aggregate and mineral resources*

Policies GLE13 B and 4.113, which specifically refuse proposals for fracking, must be made consistent with policy 4.9 and the previous London Plan.  Policy 4.9 needs to be redrafted.

# 5. Creating a greener, healthier, and resilient city

## *Introduction*

Whilst we support many of the policies set out in this chapter, we would like to see some strengthening in places. Policies that we would like particularly strengthened are:

- heat risk;
- flood risk and drainage;
- trees, biodiversity and geodiversity;
- green infrastructure;
- accessible green space, clean and healthy waterways;
- air quality; and
- we are concerned that there are no polices on noise or light pollution

We are concerned that development of homes outweighs all other considerations. We believe that it is important to provide Londoners with other facilities, including schools and medical facilities but also leisure and nature facilities.

## *GHR1 Energy efficiency*

This policy aim is welcomed.

All new developments should meet energy efficiency requirements. For refurbishments embodied energy in the existing building should be considered. Eco-friendly, sustainable materials that are breathable to avoid condensation and mould growth and overheating, should be used wherever possible.

The draft plan states that: 'Developments should minimise energy consumption through highly energy-efficient building fabric measures, design and heating systems.' We would like to see cooling systems added to this list.

## *GHR2 Low-cost low-carbon heat*

We support the increased use of communal heating systems but would like to see communal cooling systems given the same priority, given the issues that arose in summer 2026 in some blocks of flats.

## *GHR3 Whole life-cycle carbon*

Welcomed.

## *GHR4 Heat risk*

This is welcomed but while passive design solutions are good, HN8 and 5B2 are at odds with this. Green infrastructure within developments, particularly at the dense levels now being considered, is vital. Hence this policy needs to strengthen the use of green infrastructure to reduce heat risk.

In large developments where the space between blocks is to be used as public shared space, including pedestrians, children playing and walking routes, it must include trees for shade. The trees must be given sufficient space to fully mature the surrounds should aim to ensure that the roots not to impede the footpath. Mature trees are needed for shade to reduce the temperature of paved surfaces, including seating areas and front gardens.

B (2) is extremely important and a focus on cross ventilation through openable windows should be the preferred solution.

It is likely that retrofitting cooling will rely more heavily on active cooling, increasing demand for electricity.

As before, we would like to see the policy on minimising energy consumption add cooling systems.

## *GHR5 Flood risk and drainage*

We note that this applies to all applications, not just to new developments, inspection is therefore crucial as misconnections are not uncommon.

We would prefer that all sites be required to address drainage on site at some level, even if London's circumstances require some off-site contribution.

## *GHR6 Trees, biodiversity and geodiversity*

**Replacement and veteran trees**

We acknowledge the need to replace diseased and dead trees but too often one for one replacement of mature trees with young ones is considered adequate. Equivalence cannot be provided by the planting of new, young trees to replace established trees. Moreover, the urban tree canopy along streets appears to be being reduced as smaller trees are planted to replace larger ones. This may be in order to reduce the risk to private properties from subsidence, to make tree management easier or other rationales. These trees will not only reduce the shading effect, but younger trees will take some years to grow to provide any shade cover at all. We therefore strongly support sections B and C in Development management and paragraph 5.65, although we would like to see these strengthened as 'where possible' can be a 'get out' clause to not retain existing trees. It must be clear that replacement of mature trees with young trees is not adequate and should be the exception rather than the rule.

Local plans should therefore set and monitor canopy-cover targets.

We welcome protection for ancient woodland, veteran trees, etc.

**Areas of deficiency**

Areas of deficiency in access to nature need to be more clearly defined and tied together with policy GHR8 on accessible green space to prevent repetition. Areas of deficiency in green space, obviously lack access to it.

**Housing development**

New schemes should not cover the ground so densely that they prohibit the incorporation of all things needed to create homes that are fit for purpose. In new developments the building layouts need to be designed to provide sufficient space between buildings to allow for new trees to be able to flourish (para 5.63). The design should not be such that it becomes impossible to retain important trees or incorporate new trees. Replacement of existing trees is rarely adequately achieved (para 5.65) and see above. Allowing off-site planting does not recognise the importance of trees within developments (as stated elsewhere).

**Habitat**

Green and Blue corridors run throughout the area of benefit and the wider LB Barnet connecting habitats and allowing biodiversity to move through the landscape, adapting to climate change.

GHR6(E) does not fully address brownfield sites which have acquired significant habitat value. This may include some "open space" that is not seen as "green space". There is also a tendency to dismiss some greenfield and brownfield sites as 'rubbish sites' with no assessment of the value of vegetation to insects and other creatures. We would therefore

like to see protection for Open Mosaic Habitats on Previously Developed Land and other priority habitat.

We were surprised that there is no inclusion of a policy on light pollution in relation to habitat. Too much artificial light can impact species that are active at night as it confuses them. Additionally, the House of Lords Science and Technology Committee report: *Impact of noise and light pollution on human health* found that light pollution impacts negatively on human health through disrupting sleep and circadian rhythms.

## *GHR7 Green Infrastructure and Urban Greening Factor*

Green social prescribing recognises the many health benefits of green space. (https://www.england.nhs.uk/personalisedcare/social-prescribing/green-social-prescribing/) We believe that this policy can be strengthened to require LPAs to identify street and pocket parks, rain gardens, green roofs and green walls and hardstanding, etc. that can be converted into green space. Elements appear in other policies that could be brought together here as delivery expectations.

Green infrastructure policy should include a requirement for ecological lighting assessments where development may affect habitats or corridors.

Landscape and habitat plans should provide season-long forage and nesting opportunities, avoid routine pesticide use and employ ecologically sensitive management.

## *GHR8 Accessible green space*

As discussed at one of the online consultation events, walking time and walking distance are inappropriate measures of accessibility as there may be different routes and there are certainly different walking paces or no walking at all for some disabled people. However, *walking* distance must take account of road layouts and barriers such as railway lines and motorways. The routes used need to be mapped and measured and should be routes that are identified and safe to walk along, particularly at night and for women, girls and the less able.

Any proposed loss of accessible green space should require proof that the loss is unavoidable and equivalent or better replacement should be developed in advance, within the same walkable catchment area. This policy applies the UGF only to major development, leaving cumulative impacts from smaller schemes insufficiently addressed.

Large parts of the Green Belt are privately owned or publicly owned and leased to private individuals or businesses/organisations with no public right of access or only via permitted routes on foot. It may not be sustainable for areas with high biodiversity value to have cycleways through them or to be cultivated for food production.

The UGF targets and recognition of retained green cover are welcomed but a numerical score can hide nuances that should be considered.

We strongly support the development of a Barnet Regional Park. Part of this will come very close to our area of benefit in Finchley. However, nothing is set out as to how this is to be achieved. It will require a partnership between public and private owners, community and Friends groups. The precise location has not been identified. It will be important that new developments do not compromise the proposed location.

## *GHR9 Clean and healthy waterways*

We are concerned that the flood plain and green space along subsidiary waterways to the Thames, such as Dollis Brook in the area of benefit, are not encroached upon further to allow the areas to fulfil their role as flood plains. In some cases, flood plains should be restored and access to the surrounding green spaces improved, and they should receive public stewardship.

As discussed above, there needs to be stronger enforcement of misconnections.

Additionally, local plans could identify opportunities for naturalisation and de-culverting, restoring vegetated buffers, the removal of barriers where appropriate, and generally improve the ecological status. Any public access improvements must be designed so that sensitive habitat is protected.

## *GHR10 Air quality*

We are pleased to see the inclusion of paragraph B under development management relating to the '[d]emolition, construction and ongoing operations…' as this has caused particular distress relating to developments in the area of interest; one of which is adjacent to a primary school and another adjacent to a SINC.

With respect to paragraph E, we would like to see an extension that all Environmental Impact Assessments require that they include air quality within its scope.

We are disappointed that there is not a policy on noise pollution.

The House of Lords Science and Technology Committee report: *Impact of noise and light pollution on human health* found that 40% of people in the UK live with harmful levels of noise – that is above 55 decibels. Noise is the largest source of complaints to LAs in Britain and persistent noise as the report states, can lead to health concerns including memory impairment, diabetes and cardiovascular disease.

## *GHR11 Cycle and car parking*

**Cycle parking**

Considering the number of fatalities resulting from electric bike batteries, we would like to see a policy or amendment to a policy to cover safe charging within cycle parking for electric bikes.

**Car parking**

The LB Barnet has a higher mean age than other London boroughs. (ONS 2021 Census.) Just over 10% of those aged 66 plus live alone.

The focus on parking for Blue Badge holders ignores the increasing population of older residents who do not qualify for a Blue Badge, but who nonetheless have mobility problems. Restrictions on car parking at new developments that might suit downsizers and at retail facilities, might disproportionately disadvantage older people unable to use public transport and carry their purchases home. Larger facilities similar to Brent Cross shopping centre which serve as an outing as much as a shopping destination for some older people, especially those who live alone, may need more parking.

# 6. Place visions and place-based approaches

## *Introduction*

In this section we respond to policies PV3, PV4, PV6 and PV7.

Our main points relate to town centres, MOL and Green Belt.

**Town centres**

Well managed, multi-use town centres are important parts of London's infrastructure and its appeal for residents and visitors. They should have a mix of well-placed housing, community spaces, sports facilities, libraries and retail that enable community engagement thereby supporting community cohesion.

**MOL and Green Belt**

Clarification of the definition of MOL and when it can be released is welcomed.

## *PV3 Town centres and high streets*

The LB Barnet Local Plan 2021-2036 refers to a hierarchy of town centres, with Finchley Central and North Finchley designated as Town Centres, East Finchley as a District Town Centre and Friern Barnet as a local and neighbourhood town centre. This 'local hierarchy' is a way of emphasising local differences which provides a context for planners and developers. This emphasis on 'place' provides an opportunity to maintain the character of an area, which is important to residents and provides a focus for business. Such an approach could be valuable in the draft London Plan.

High streets in town centres are centres for the local community and need support to combat decline. There are opportunities for additional housing, but careful consideration needs to be given to the distribution and intensity of such housing so that it does not undermine the nature of the high street. It is important that high streets are seen as places for the community. Any housing development should use the opportunity to include community spaces so that the hight street is an attractive place to visit and meet, strengthening local communities. The draft plan should also encourage LPAs to consider the accessibility of green spaces to high streets when reviewing development applications for high streets, expanding the idea of healthy streets.

Intensification of housing in town centres raises the importance of surrounding green spaces (including MOL and Green Belt) and the connection between these spaces and town centres.

We agree with the policy to promote town centres as vibrant and resilient acknowledging that improvements for greening and healthy streets should be encouraged.

Encouragement for mixed use is also positive, but the draft plan should set out how LPAs should address the distribution of housing and shops so that the high street has some coherence and is an attractive destination for visitors.

Any housing intensification should be in context, requiring very careful consideration of surrounding areas, especially conservation areas and locally listed building as well as the impact on the local environment. This should be strengthened in the draft plan.

Reducing car dependency is supported but it cannot be eliminated in the suburban context. However, the impact of this policy on areas surrounding new developments (on car parks and existing residential streets, for example) needs to be considered with appropriate measures to mitigate these negative effects.

We strongly support restrictions on concentrations of specific and cumulative sui generis uses (such as betting shops, adult gaming centres, pawnbrokers, pay day loan shops and hot food takeaways) that can have a negative impact on town centre diversity, community safety and/or the health and well-being of Londoners.

In the area of benefit there is also a proliferation of shops selling the same goods – primarily small food and grocery shops. We support greater LA control over the mix of shops to ensure a balanced high street. Only by having a wide mix of shops can high streets thrive.

We strongly support paragraph E – the designation of street and covered markets on [LPAs] Policies Map.

We would like to see a similar designation for 'community spaces' for the same or similar reasons, supported by the necessary infrastructure for power, water and lighting, which would be suitable for 'town centre' community events, in support of the policy for 'vibrant' high streets as set out in PV2 A.

We were surprised that there is no mention of town teams in the draft plan. This is an international movement begun in Australia whereby local residents and businesses volunteer to enhance their town. East Finchley and Finchley Central both have town teams (albeit that they are suburban high streets) and the community of North Finchley is discussing whether to establish one. The LB Barnet is very supportive of town teams, and we think that the plan should encourage their growth elsewhere. Supporting volunteers in an area would help build and strengthen communities, improving community cohesion.

## *PV6 Metropolitan Open Land (MOL)*

We support the part of the policy which aims to establish the purposes of MOL and provide a framework for its protection. Clarification on when MOL can be released is also welcomed.

In the area of benefit MOL is exceptionally important.

## *PV7 Sustainable development and enhancement of the Green Belt*

Finchley is popular for its parks, MOL and Green Belt location. Easy access to green space in much of the area of benefit is vital in enabling London to provide a variety of living environments. There are also areas of deficiency in access to green space.

We would therefore like to see Green Belt release as an 'option of very last resort' with the LPA and developers needing to demonstrate, in detail, that all other options have been explored.

The impact of the loss of Green Belt and the benefits it supplies – clean air, wildlife habitat (especially for pollinators), water storage, water provision, cooling, food growing (including commercial growing), etc. as well as benefits to mental and physical health of people – should be evaluated and given greater weight than land suitability for buildings, accessibility to transport, etc. The UK is one of the most nature denuded countries in the world and if this is to be reversed, great care much be taken to retain and improve green space. (https://www.wildlifetrusts.org/news/landmark-report-shows-uk-wildlifes-devastating-decline)

Moreover, access to existing infrastructure is an insufficient criterion. Transport may not remain accessible if too much housing leads to unworkable levels of overcrowding. Similarly for water supply, sewage processing and electricity.