RESPONSE TO THE DRAFT LONDON PLAN CONSULTATION

Barnet Conservative Group

Foreword

Barnet is being asked to pay the price for the Mayor of London's failure to deliver new housing across the Capital. The Draft London Plan gives Barnet the highest housing target in London and skews every planning policy possible to help force it through. Barnet Conservatives support building new homes, but we will not support a plan that puts our Green Belt, suburban neighbourhoods and local services at risk.

Our objections are straightforward. Barnet is being told to build 32,849 homes, more than any other London borough. This target is unfair. It places too much of London's housing requirement on Barnet, even though our borough has already delivered major developments and has consistently been one of the top performers for housing in London.

The Plan also depends on releasing Green Belt land for 7,000 homes. The Mayor has not shown that this target is justified in the wider London context, that suitable sites are available or that the homes can be delivered within the plan window. The Green Belt should not be used as an easy answer to an unrealistic London-wide target, shifted disproportionately onto its suburban boroughs.

There is also no clear plan for the infrastructure services needed to support this level of growth. The Mayor has not shown that Barnet's roads, public transport, schools, healthcare and other local services can cope. For a plan which relies on several underground stations as suitable for 'major residential growth', there is no effort to display why these end-of-line and limited capacity stations will be able to take the strain of thousands of new commuters. Residents are being asked to accept the development now and hope that the infrastructure follows later.

The Plan would also allow taller and denser development across suburban Barnet. It treats very different parts of London as if they were the same and gives too little weight to local character. Barnet should not be made to look and feel like inner London simply because City Hall wants to fit more units onto every available site. London's suburbs do not exist as spare building sites for the Mayor of London, but as a distinct place which reconciles the character of the Capital and the countryside.

The homes being demanded are also not the homes Barnet needs, with a concession that the 'vast majority' will be one or two bedroom flats despite Barnet's own Local Plan seeking over 70% of new market homes as 3 plus bedrooms. The Plan obsesses over the number of units rather than giving proper weight to family-sized homes. The result could be thousands more small flats, while families find it harder to remain or start a life in the borough.

The same one-size-fits-all approach can be seen in the Plan's parking policies. Car-free and car-lite development may work in areas with excellent public transport, but many parts of Barnet do not have those alternatives. Removing parking spaces will not remove cars. It will push more vehicles onto already crowded residential streets. The London Plan should not be engineered to channel the Mayor of London's ideological campaign against motorists.

These six failures make the Draft London Plan the wrong plan for Barnet. It asks too much of our borough and offers too little in return. Our technical response sets out the full evidence and the changes that are needed: a fair housing target, protection for the Green Belt, properly funded infrastructure, safeguards for suburban character, more family homes and sensible parking policies that reflect how people in outer London live.

We regret that Barnet Council's leadership did not inform residents of this consultation when it was still open. However, we hope that this response will reassure Barnet's residents that someone is fighting their corner.

Barnet Conservatives will stand with residents and Residents' Associations against a clumsy and unfair plan imposed from City Hall. We support the right homes in the right places, but we will not accept the wrong plan for Barnet.

Barnet Conservative Group
October 2026

Introduction

Barnet Conservatives support delivering the homes London needs, including in Barnet. We object, however, to the Draft London Plan because, as applied to Barnet, its housing requirement, Green Belt release, density and design framework and supporting guidance are not justified by proportionate evidence and are not shown to be deliverable. They therefore fail the tests of soundness at paragraph 35 of the National Planning Policy Framework (NPPF) [1].

Barnet Conservatives object to the Draft Plan on seven grounds:

(1) the housing target set for Barnet is unrealistic and, compared with the treatment of other boroughs, disproportionate;

(2) the Green Belt release required in Barnet is not justified by the evidence and does not demonstrate exceptional circumstances;

(3) the Plan does not demonstrate that the transport and social infrastructure needed to support its own targets will exist or be funded;

(4) the density and design framework applies uniform height and density expectations without regard to Barnet's suburban character;

(5) the housing-mix and housing-need assumptions are inconsistent with Barnet's locally evidenced need;

(6) the parking and transport policies take insufficient account of Barnet's circumstances; and

(7) Policy MBUL2 Part C(2) makes compliance with a separate Small Site Design Code, which has not been examined and is still in consultation, acceptable in principle in design terms.

1. Housing Targets: Unrealistic and Disproportionate

Summary. The 32,849-home target is the highest of any London borough and, as reported, the largest increase on the current target, while boroughs that delivered far less against their own targets have received reductions. The Draft Plan itself warns that targets set beyond what is reasonably achievable weaken the plan-led approach.

Table 3.1 allocates Barnet a ten-year target of 32,849 homes (25,849 on brownfield land and 7,000 on greenfield land) [2]. That is the highest in London, as the five largest targets show:

Local planning authority	Brownfield	Greenfield	Total
Barnet	**25,849**	**7,000**	**32,849**
Ealing	31,979	none	31,979
Greenwich	27,850	none	27,850
Southwark	27,799	none	27,799
Newham	26,260	none	26,260

Source: Draft London Plan, Table 3.1.

This represents a 38% increase on Barnet's target under the current London Plan [3].

Paragraph 1.19 of the Draft Plan identifies the risk directly: 'If targets are set in the London Plan beyond what is reasonably achievable for local planning authorities (LPAs), this would weaken the plan-led approach and thereby undermine the very framework that is vital to actually enable the growth and address its impacts' [4]. The same paragraph links that risk to the NPPF's Housing Delivery Test and five-year housing land supply requirements. An unachievable target would expose Barnet to those consequences.

Barnet is a predominantly outer-suburban borough with a substantial Green Belt, and has been independently described as one of the highest-performing London boroughs against its current target [3]. Barnet's increase in housing target is not matched by delivery performance elsewhere. Lewisham delivered only 23% of its three year 2021 to 2024 housing target, yet its new target falls by 16%. Greenwich delivered 39% and its target falls by 1%. Barking and Dagenham delivered 59% and its target falls by 50% [3]. Moving London's housing target (which has only increased by about 5% between the 2021-2031 and 2027-2037 London Plans) away from under-delivering areas and toward a comparatively strong-delivering borough (an increase of 38% well beyond the change in London's target overall) is not explained in the supporting text. It is difficult to reconcile with the Justified test of soundness, which requires 'an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence' [1].

The Draft Plan acknowledges that the ability to deliver new homes 'is not simply linked to land availability, infrastructure capacity or environmental factors, but is constrained by viability, which is impacted by a wider macro-economic context that changes over time' (paragraph 3.21) [2]. Paragraph 3.22 states that the Table 3.1 targets reflect the expected delivery associated with following the spatial strategy [2]. A ten-year target fixed against a macro-economic context that the Plan itself accepts will change needs a mechanism for review. The Plan contains none that we have identified. The NPPF expects strategic policies to be reviewed at least every five years [1]. A five-year cycle does not replace a trigger tied to the viability assumptions on which the targets rest.

Barnet receives the highest target in London. As section 3 of this response shows, the Plan does not demonstrate that Barnet has the infrastructure capacity to support it.

We also note that the credibility of the Government's own national ambition is publicly in question: the Deputy Prime Minister has acknowledged only a 'slim chance' of the Government's 1.5 million homes target being met [5]. A national target that the Government itself doubts should not be used to justify an equally doubtful sub-target for Barnet.

Modification sought

(a) That Table 3.1 be modified to reduce Barnet's housing requirement, redistributing a proportionate share to boroughs with a demonstrated record of under-delivery against their current targets, consistent with the Justified and Effective tests of soundness; or, in the alternative, that any increase in Barnet's target be conditioned on independent verification of deliverable brownfield and Green Belt capacity specific to the borough.

(b) That Table 3.1 be accompanied by a monitoring and early-review mechanism, so that borough targets are reset if the viability and macro-economic assumptions acknowledged at paragraph 3.21 do not hold.

2. Green Belt Release: Not Justified

Summary. The release of Green Belt land for 7,000 homes in Barnet is not supported by evidence of exceptional circumstances, of site availability, or of viable delivery of the affordable and family homes that would be needed to justify it.

Green Belt boundaries may be altered only through the plan-making process, and only where exceptional circumstances are fully evidenced and justified [6]. The NPPF sets five purposes for the Green Belt: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land [6]. Barnet's Green Belt forms part of the belt that contains the built-up area of London and keeps it distinct from neighbouring towns (as well as the various town centres which make up the Borough), as well as giving residents access to open countryside within the Capital. Barnet's own Local Plan and Green Belt evidence should be read alongside this representation.

Three further requirements apply. Before concluding that exceptional circumstances exist, the plan-maker must show that it has examined fully all other reasonable options for meeting its identified need (paragraph 147). It must give priority to previously developed land, then grey belt, before other Green Belt land (paragraph 148). And major housing development on released land must make the 'Golden Rules' contributions of affordable housing, necessary infrastructure and publicly accessible green space (paragraph 156) [6].

The NPPF also defines 'grey belt' land, broadly land in the Green Belt that is previously developed or does not strongly contribute to purposes (a), (b) or (d) [7]. Barnet Council's own evidence (Green Belt Assessment for Barnet) already assesses how Barnet's Green Belt performs against the purposes set out in national policy. That evidence shows that parts of the area identified for growth make a strong contribution to Green Belt purposes. The Draft Plan should therefore explain how this local assessment was taken into account when defining the proposed release areas and calculating their housing capacity. The GLA should publish a site-by-site appraisal showing how each area was assessed against the relevant Green Belt purposes, why release is justified notwithstanding Barnet's evidence, and how the proposed boundaries and capacity assumptions were determined.

The Plan counts 7,000 homes on Green Belt land in Barnet, but we are aware of no published evidence of site availability for the release areas, such as landowner intentions, tenancies, or promoter interest. Land

ownership is complex, and the Plan's capacity assumptions do not reflect it. Government guidance expects sites relied on for housing to be shown to be suitable, available and achievable [8].

The Mayor's own Green Belt Strategic Approach evidence paper (July 2026) states that site-specific viability testing for the Broad Locations for Growth it relies on is 'deferred to Local Plan preparation' [9]. The strategic case for release has therefore not tested the viability of the specific sites on which it depends. The same paper acknowledges that even full delivery of the identified Green Belt capacity 'would not be sufficient to fully balance London's anticipated unmet housing needs', and represents 'the maximum that was considered reasonable and plausible' within the plan period [9]. On the GLA's own account, the release is unproven at site level and would still be insufficient to meet the need it is meant to address.

The exceptional-circumstances case rests on meeting housing need, above all affordable need. Release sites will carry substantial infrastructure costs, which the Plan has not quantified (see section 3). Where viability testing is deferred and infrastructure costs are unquantified, there is no evidence that release will deliver policy-compliant affordable housing. A release that cannot show it will deliver the need that justifies it has not demonstrated exceptional circumstances. The Golden Rules in paragraph 156 depend on exactly that viable delivery. This is a failure of the Justified and Effective tests, and of consistency with national policy (paragraphs 145 to 148 and 156).

Policy PV7 treats Green Belt land as sustainably located where the majority of new homes would be within 1,200 metres of a suitable rail station, or on a bus corridor meeting a demanding set of tests [10]. Table 6.3 expects residential schemes on released Green Belt land to achieve average net densities of at least 90 dwellings per hectare, and independent analysis concludes that at 90 dwellings per hectare and above, 'development will be overwhelmingly flatted' [10]. That directly undermines the case for meeting Barnet's locally evidenced need for family-sized homes through Green Belt release (see section 5 of this response), and as set out in section 3 of this response we do not accept that the infrastructure capacity needed to apply this test to Barnet has been demonstrated.

Modification sought

That the 7,000-home Green Belt allocation to Barnet be removed from Table 3.1 pending the appropriate revision of Barnet's housing target as requested under section 1 of this response, as well as a published, site-specific assessment, for each proposed release site, of exceptional circumstances, availability, viability (including infrastructure costs) and deliverability of affordable housing, consistent with the NPPF and the Justified test of soundness.

3. Infrastructure: Undemonstrated Capacity

Summary. The Draft Plan does not demonstrate either the current infrastructure capacity or the future funded investment that would justify major residential expansion in Barnet. Barnet has one of the highest targets in the Plan without evidence of corresponding capacity.

As we read Figure 6.4, the Draft Plan identifies station areas in Barnet, including Mill Hill Broadway, Mill Hill East, High Barnet, Totteridge and Whetstone and Woodside Park, as locations for major residential growth [11]. It does not demonstrate that these stations, and the lines serving them, have capacity to accommodate it. High Barnet and Mill Hill East are the termini of Northern line branches, and Mill Hill East is a single-track branch. We request that TfL's current published capacity and crowding data for these five stations and the

Northern line branches serving them be placed on the record before any growth allocation that depends on them is confirmed.

The presence of a station does not of itself add capacity for new development. The Plan should explain what benefit it assigns to a station in assessing development potential, and why a terminus on the outer end of a branch line is treated as comparable to an interchange hub such as Vauxhall or Elephant and Castle. Barnet's circumstances differ materially from those of central London locations.

We also ask the GLA to publish a borough-by-borough comparison of funded infrastructure investment over the plan period, set against the Table 3.1 targets, so that the Panel can test whether Barnet's investment is proportionate to the highest target in London. The Plan should also identify any funded scheme that would increase capacity on the Northern line branches serving High Barnet and Mill Hill East.

The Plan's wider deliverability also depends on strategic transport schemes that are not funded. Neither Crossrail 2 nor the Bakerloo line extension has secured committed government funding, and the Mayor has stated that Transport for London cannot invest in renewal or expansion 'without a long-term deal from the government' [12]. A strategy resting on infrastructure that is neither built nor funded is difficult to reconcile with the Effective test of soundness, which requires a plan to be deliverable over the plan period. Strategic policies must also make sufficient provision for transport infrastructure and for community facilities such as health and education (paragraph 20), and policies should not undermine the deliverability of the plan (paragraph 34) [1].

We do not accept the characterisation, sometimes advanced, that TfL's new Sustainable Access Measure (SAM) simply substitutes walking distance for actual public transport capacity. SAM combines a 60-minute public transport catchment, a 30-minute public transport catchment, and a 10-minute walking catchment [13]. Our objection to the use of SAM to advance the argument for densifying large parts of London concerns the data. Independent technical analysis has identified that several of SAM's underlying datasets are not openly licensed, limiting independent reproducibility of borough-level results, and that its time-of-day assumptions remain unpublished [13]. A metric used to justify density and height increases across Barnet should be transparent and independently checkable.

Applying Barnet's 2021 Census average household size of 2.615 (389,340 residents across 148,917 households) [14] to the 32,849-home target implies approximately 85,900 additional residents over the plan period, an increase of roughly 22% on the current population. We ask the GLA to identify the funded programme for school places, primary care capacity and public transport capacity that accompanies this figure.

Modification sought

(a) That no Green Belt or high-density allocation be confirmed for stations or corridors that depend on unfunded transport infrastructure, including Crossrail 2 and the Bakerloo line extension, unless and until that funding is committed.

(b) That TfL publish the datasets, weightings and time-of-day assumptions underlying SAM scores for Barnet, and current capacity and crowding data for the stations named at Figure 6.4, to allow independent scrutiny of the accessibility case for growth.

(c) That the Plan include a borough-level infrastructure investment comparison, set against Table 3.1 targets, before targets are confirmed.

4. Height and Density Prioritised over Design

Summary. The Draft Plan applies one London-wide framework of minimum densities and heights, backed by a 'very significant weight' test, to a borough whose character, accessibility and infrastructure differ markedly from inner London.

Policy MBUL2 Part C(3) provides: 'Failure to meet the requirements of this policy should be given very significant weight in planning decisions' [15]. Paragraph 2.42 states that 'Mid-rise development of four to nine storeys is a key focus in the Optimisation Framework and will need to be delivered across many more parts of London' [15]. Policy MBUL3 applies to development of 30m and above in height [15].

Read together, these provisions create a strong, uniformly applied presumption toward height and density, with no differentiated treatment for a predominantly low-rise suburban borough such as Barnet. We ask the Panel to consider whether uniform application of the Optimisation Framework, without borough-differentiated evidence on character, townscape or infrastructure capacity, meets the Justified test of soundness.

The Optimisation Framework relies on SAM in place of the previous PTAL system. PTAL allowed greater distinction between local pressures and needs, whereas SAM applies one formula across London. We ask how amenity is defined and weighted in SAM, and whether the definition is applied uniformly. A village centre such as High Barnet and a high street such as East Finchley differ in function, but it is not clear that the metric distinguishes them. We ask the GLA to publish, for Barnet, a borough-level comparison of PTAL and SAM results and the resulting change in density expectations, so that the effect on the borough's development capacity can be tested rather than assumed.

National policy requires planning policies to take into account the desirability of maintaining an area's prevailing character and setting (paragraph 129(d)). It also asks policies to avoid low densities where land is short (paragraph 130) [16]. Paragraph 129 lists character among the factors to be weighed together. A 'very significant weight' test in Part C(3) removes that weighing. The diversity of London's character cannot be addressed by a uniform formula. The GLA's own Small Site Design Code accepts the point in part, stating that the London Context Map 'should not be used rigidly' in establishing character (paragraph 3.2.9) [17]. If the Context Map cannot be applied rigidly at site level, it cannot justify uniform density expectations at borough level either.

Modification sought

That Policy MBUL2 and the Optimisation Framework be modified to permit differentiated minimum density expectations for predominantly suburban, low-rise character areas such as Barnet, supported by borough-level townscape and infrastructure-capacity evidence, rather than a uniform London-wide minimum applied without local differentiation; and that the 'very significant weight' provision in Part C(3) be removed or confined to cases where the borough has adopted the relevant density expectations through its own evidence.

5. A 'One Size Fits All' Approach to Housing Need

Summary. The Draft Plan applies London-wide assumptions about housing size and specialist need that do not reflect Barnet's locally evidenced need for family homes, and it allocates Barnet the highest purpose-built student accommodation requirement in London without published reasoning.

The Draft Plan states that 'London is a single housing market area and the majority of London's need lies in one and two bed homes' (paragraph 3.95) [2]. It also acknowledges that 'family-sized housing accounts for a much larger proportion of need in affordable tenures than in market homes' (paragraph 3.96) [2]. Barnet's adopted Local Plan treats protecting family-sized homes as a priority, and expects all new developments to include a proportion of them [18]. National policy requires the size, type and tenure of housing needed for different groups, including students, older people and families with children, to be assessed and reflected in planning policies [19].

A single London-wide mix assumption applied to a borough with a separately evidenced local need is difficult to reconcile with that requirement and with a plan-led approach. The Small Site Design Code is further evidence of this one-size-fits-all approach, applying London-wide design parameters without sufficient regard to borough-level housing need and local character. It also connects directly to section 2 of this response: independent analysis shows that Green Belt release sites built at the densities the Plan expects will be 'overwhelmingly flatted' [10], so the Plan's density requirements are structurally at odds with family-home delivery in Barnet.

Table 3.6 apportions a London-wide purpose-built student accommodation (PBSA) requirement of 31,549 bedspaces. Barnet's requirement of 2,127 bedspaces is the highest of any borough, some 6.7% of the London total [2]:

Local planning authority	PBSA requirement (bedspaces)	Share of London total
Barnet	**2,127**	**6.7%**
Ealing	2,003	6.3%
Greenwich	1,741	5.5%
Southwark	1,737	5.5%
Camden	725	2.3%
Islington	300	1.0%
Westminster	no target listed	n/a

Source: Draft London Plan, Table 3.6 (2027/28 to 2036/37). Shares calculated from the table total.

The Plan does not explain how the London-wide figure was apportioned between boroughs, or how Barnet's requirement relates to student demand, to where students study and to where they live. We ask the GLA to publish the apportionment method. Without it, the Panel cannot test whether the Barnet figure rests on evidence specific to the borough.

Modification sought

(a) That the housing size-mix policy (Policy HN7 and paragraphs 3.95 and 3.96) be modified to allow boroughs with an evidenced local need for family housing, such as Barnet, to apply a locally justified mix that departs from the London-wide 'single housing market' assumption.

(b) That the GLA publish the method used to apportion the Table 3.6 PBSA requirement between boroughs, and review Barnet's requirement against that method and the borough's student demand.

6. Parking and Transport Policy Without Local Evidence

Summary. The Draft Plan's parking policy keeps car-free and car-lite development as the starting point across London. For an outer London borough with thinner public transport, that is not supported by borough-level evidence of car use or public transport provision.

Policy GHR11 and Tables 5.8 and 5.9 set maximum car parking standards [20]. Commentators on the Draft Plan note that parking standards are reframed under GHR11 through SAM and the character of the location, 'with car-free or car-lite development remaining the starting point' [21], and that the approach reinforces a 'car-free' and 'car-lite' approach to development [22]. Independent analysis of the Plan's Green Belt strategy separately observes that parking restraint raises 'a genuine deliverability question' where car ownership is materially higher and public transport networks thinner than in inner London [10].

National policy requires local parking standards to take into account accessibility, the availability of public transport and local car ownership levels (paragraph 112). It allows maximum standards only where there is a clear and compelling justification, either that they are necessary for managing the local road network or that they optimise density in city and town centres and other locations well served by public transport (paragraph 113) [23]. The Plan differentiates its maximum standards by accessibility, but we have not found in it evidence of local car ownership levels or a justification specific to Barnet. Car ownership in Barnet is significantly higher than in inner London. Parking standards should reflect local ownership levels, not a uniform London-wide approach.

Barnet is a borough where that evidence matters. It is largely suburban, and the stations serving much of it are termini and outer stops on branch lines (see section 3). We ask the GLA to set Barnet's 2021 Census car-availability data (ONS table TS045) against the London average, and to explain why a single London-wide starting point is justified in light of that evidence. A parking policy that cannot be shown to reflect local car dependence is not Justified or Effective. Cars displaced from new development will park on neighbouring streets.

The same concern arises under the Small Site Design Code (see section 7 of this response). In suburban contexts it says only that in-curtilage parking can be proposed within a limit on the share of the frontage it may occupy (page 13), and it contains no test of on-street parking stress [17].

Modification sought

That Policy GHR11 and Tables 5.8 and 5.9 be modified so that maximum parking standards in outer London boroughs reflect borough-level evidence of car ownership and public transport provision, rather than a uniform London-wide starting point, so that the standards meet paragraphs 112 and 113 of the NPPF, and so that development proposals must assess on-street parking stress.

7. Small Site Design Code: Policy Substance Outside the Examination

Summary. Policy MBUL2 Part C(2) makes compliance with the London Small Site Design Code acceptable in principle in design terms. The Code is guidance that has not been examined, is still out to consultation, and would apply in ways that conflict with the Plan's own principles of accessibility and character.

Policy MBUL2 Part C(2) provides that development proposals on sites below 0.25ha that meet the requirements of the London Small Site Design Code, or a rearticulated small sites design code prepared by plan-making authorities where applicable, are acceptable in principle [15]. Part A(3) invites boroughs, where they consider it necessary, to build on the Code in a local design code [15]. The Code itself confirms that it

supports Policy MBUL2 and that compliant proposals benefit from 'a presumption that their design is acceptable in principle' (paragraph 1.2.12) [17].

The Code raises three difficulties of soundness. The first is sequence. The consultation on the Code closes on 4 December 2026 [24], seven weeks after this consultation closes, so respondents to the Plan are asked to accept a policy whose operative content they cannot yet see in final form. The second is status. The Code is London Plan Guidance rather than policy and will not be examined with the Plan, yet the Plan gives it decisive weight on design acceptability. A test of this importance belongs in the Plan, where it can be examined, or it should operate only as a material consideration. The third is effect. Paragraph 2.3.2 of the Code provides that where a proposal satisfies the height, privacy and massing parameters, the decision-maker 'should not seek to impose additional requirements in relation to these parameters unless there is a site-specific justification' [17]. That narrows the discretion of local planning committees on height, privacy and massing. A local code takes precedence only if it is consistent with Policy MBUL2 Part A(3) (paragraph 1.2.14), so the borough's ability to protect character depends on a consistency judgement the Plan does not define. National policy expects design guides and codes to reflect local character and design preferences and to be based on effective community engagement [25]. A single London-wide code, finalised after the Plan, sits uneasily with that expectation.

On our reading of the consultation draft, the following features of the Code are of particular concern:

Provision	Code reference	Concern
Height by site type	Pages 15 to 50	Suburban infill and redevelopment is limited to 3 storeys including roof, or the prevailing height if taller. Detached corner plots (suburban) and backland sites may be one storey over the prevailing context. High street infill may be one storey over where the top storey is set back.
How 'prevailing height' is measured	Figure 6, page 9	A storey is assumed to be 3 metres, and an existing roof counts as a storey 'even when [it is] not inhabited'. On this method, a two-storey house with a pitched roof presents a prevailing height of three storeys, so a corner plot or backland site next to it may be developed to four.
Eligibility by accessibility	Pages 15, 18, 21, 24, 46	Side-street infill, street extension, rear-street, mid-street and backland development apply in all SAM bands 1 to 5, including the least accessible areas and including conservation areas (outside the curtilage of listed buildings). This conflicts with the Plan's own principle that intensity should follow accessibility.
Footprint and garden land	Pages 15 to 31	New dwellings may have up to twice the footprint of the existing dwelling, retaining at least 50% of the non-developed area. We found no minimum garden size for the host dwelling and no tree, biodiversity or urban greening requirement beyond front-garden planting.
Separation distances	Pages 15 to 46	In suburban contexts the Code sets 16m between habitable windows and 12m to a blank elevation, with a 10m privacy zone to neighbouring gardens. We ask the GLA to compare these with the distances applied by Barnet's own Residential Design Guidance.
Character context	Paragraphs 3.2.8 to 3.2.10, 1.2.16	The applicant identifies the character context by a 'short desk-based inspection'. Mixed or unlisted contexts default to the terraced parameters, which are more permissive than the suburban ones. Paragraph 1.2.16 treats changes in building scale and density as 'opportunities to optimise land use'.

Provision	Code reference	Concern
Family homes	Paragraphs 4.2.8 and 4.2.10	Redevelopment 'should' not result in a net loss of family dwellings, and should contain at least one home of three bedrooms or more where one has been removed. This is an expectation, not a requirement, and a single replacement family home satisfies it.
Cumulative impact	Paragraph 1.2.15	The Code describes small sites as a strategic housing resource but contains no test of cumulative impact on a street or neighbourhood and no infrastructure mechanism.

The GLA's own decision paper commissioning the Code recognises the risk. Its officers noted that a code that is too flexible may make poor schemes hard to refuse, citing Croydon [26], and the supporting paper records that Croydon's Suburban Design Guide was revoked in 2022 after opposition [27]. The Code's own worked examples include several redevelopments in the London Borough of Croydon in which a single house was replaced by five to seven homes (pages 28, 31 and 32).

This ground addresses the Plan. Barnet Conservatives will respond separately on the Code itself in the consultation that closes on 4 December 2026.

Modification sought

(a) That Policy MBUL2 Part C(2) be modified so that compliance with the London Small Site Design Code is a material consideration and does not confer acceptability in principle, until the Code has been finalised after consultation and its content has been tested at examination.

(b) That Policy MBUL2 be modified so that a locally adopted design code, or borough character evidence, takes precedence over the London-wide Code, without the Code's consistency test.

(c) That the Plan require any small-site code to limit infill and backland eligibility to areas whose accessibility supports the intensity proposed, to give weight to local character and conservation areas, and to set requirements (not expectations) for family housing, garden land, trees and cumulative impact.

Conclusion

For the reasons above, Barnet Conservatives consider the Draft London Plan unsound as it applies to Barnet. It is not shown to be deliverable. Its Green Belt release and infrastructure assumptions are insufficiently evidenced. Its housing targets are applied unevenly between boroughs with different delivery records. It does not differentiate for a predominantly suburban, low-rise, family-oriented borough. It relies on a Small Site Design Code that has not been examined. Finally, its parking provisions lack local evidence and accommodation for outer London boroughs. We ask the Panel to find the Plan unsound in these respects and to adopt the modifications sought.

Submitted on behalf of Barnet Conservatives, London Borough of Barnet.

Notes and Sources

[1] National Planning Policy Framework, Chapter 3 (Plan-making): paragraph 20 (strategic policies and infrastructure), paragraph 33 (review at least every five years), paragraph 34 (policies must not undermine deliverability) and paragraph 35 (tests of soundness).

[2] Draft London Plan, July 2026, Chapter 3: Table 3.1 (housing targets), paragraphs 3.21, 3.22, 3.95 and 3.96, Tables 3.6 and 3.7.

[3] Barnet Post, 'The new London Plan punishes Barnet' (22 August 2026); Parikiaki, 'Barnet committed to delivering homes residents need' (August 2026).

[4] Draft London Plan, July 2026, paragraph 1.19.

[5] Reporting on the Deputy Prime Minister's comments on the 1.5 million homes target, August 2026 (Architects' Journal).

[6] National Planning Policy Framework, Chapter 13 (Protecting Green Belt land): paragraphs 143 (five purposes), 145 (exceptional circumstances), 147 (all other reasonable options), 148 (priority for previously developed land, then grey belt) and 156 (Golden Rules).

[7] National Planning Policy Framework, Annex 2 (Glossary), definition of 'grey belt'.

[8] GOV.UK, Planning Practice Guidance: Housing and economic land availability assessment (suitable, available and achievable sites).

[9] London Plan Green Belt Strategic Approach evidence paper, GLA (July 2026).

[10] Bidwells, 'The Draft London Plan's Green Belt Strategy: Does It Go Far Enough?' (2026), on Policy PV7 sustainable-location criteria, Table 6.3 densities and outer-London car ownership.

[11] Draft London Plan, July 2026, Chapter 6: Figure 6.4 (major areas for residential growth), Policy PV7 and Table 6.3.

[12] CityAM, 'Why there's no hope of a Bakerloo Line extension or Crossrail 2 without government cash'.

[13] Podaris, 'Making Sense of TfL's new Sustainable Access Measure (SAM)'.

[14] Barnet 2021 Census Factsheet: 389,340 residents, 148,917 households.

[15] Draft London Plan, July 2026, Chapter 2: Policy MBUL2 (Parts A(3), C(2), C(3)), paragraph 2.42 and Policy MBUL3.

[16] National Planning Policy Framework, Chapter 11 (Making effective use of land): paragraph 129(d) (prevailing character and setting) and paragraph 130 (avoiding low densities where land is short).

[17] Greater London Authority, London Small Site Design Code: Consultation Draft (London Plan Guidance), September 2026. Page references in the text are to this document.

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[25] National Planning Policy Framework, Chapter 12 (Achieving well-designed places): design guides and codes to reflect local character and design preferences and be based on effective community engagement.

[26] GLA Assistant Director Decision ADD2784: London-wide Small Site Design Code (officer risk assessment).

[27] GLA, request for Assistant Director Decision ADD2784 (section 4: Croydon Suburban Design Guide SPD revoked in 2022; risk that over-flexible codes make poor schemes hard to refuse).