



Barnet Draft Local Plan
Publication Stage Representations Form

Ref: (For official use only)

PART B - Your representation

Please complete a separate Part B for each representation and return along with a single completed Part A.

Question 1: To which part of the Local Plan does your representation relate?

Representations must be made on a specific policy or part of the Plan, please state the policy number, paragraph number, figure/table or Policies Map designation.

Policy __BSS01__ Paragraph _____ Figure/Table _____

Policies Map designation _____

Question 2: Do you consider that this part of the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

- | | | |
|--|---|--|
| a) Legally compliant | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| b) Sound | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| c) Compliant with the Duty to Co-operate | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound, or fails to comply with the duty to co-operate.

Please be as precise as possible. If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this box to set out your comments.

<p>The plan is considered to be unsound as the plan period will not be a minimum of 15 years from adoption as set out in Paragraph 22 of the NPPF.</p> <p>The plan is expected to be adopted in Autumn 2022 according to the Council web-site.</p> <p>A fifteen year plan period from Autumn 2022 would require an extension to the plan period of at least one year.</p> <p>An extended plan period would require a proportionate increase in the stated minimum housing requirement set out in Policy BSS01</p>

Continue on a separate sheet if necessary

Question 4: Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect to the matters you have identified in Question 3 above. *Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

The plan period should be extended by at least one year to 2037

The housing requirement set out in Policy BSS01 should be increased to reflect the extended plan period.

Continue on a separate sheet if necessary

Please note:

In your representation you should summarise succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

Question 5: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing sessions?

Yes, I wish to participate in hearing session(s)

No, I do not wish to participate in hearing session(s) /

I am not seeking modification to the Plan

Question 6: If you wish to participate at the examination hearings, please outline why you consider this to be necessary.

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.

To explain why the plan period should be consistent with advice in Paragraph 22 of the NPPF

To explain why the housing requirement should be increased to reflect such a change in the plan period

Declaration of consent

The personal information you provide on this form will be processed in accordance with General Data Protection Regulations 2018 (GDPR). The information you provide will only be used for the purposes of the preparation of the Local Plan as required by the Planning and Compulsory Purchase Act 2004 (as amended), and may be used by the Council to contact you if necessary, regarding your submission. Your name, name of organisation, and comments, will be made available for public inspection when displaying and reporting the outcome of the statutory consultation stage and cannot be treated as confidential. You will not be asked for any unnecessary information and we will not publish any personal data beyond what is stated in this declaration.

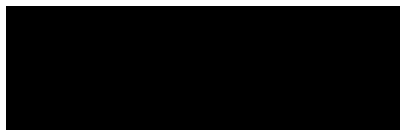
Your details will be kept in accordance with the Council's Privacy Notice, until the Local Plan is adopted plus a further five years to evidence that a fair and transparent process has been followed. Processing is kept to a minimum and data will only be processed in accordance with the law. We will take all reasonable precautions to protect your personal data from accidental or deliberate loss or unauthorised disclosure.

The Council's Privacy Notice can be viewed at <https://www.barnet.gov.uk/your-council/policies-plans-and-performance/privacy-notices>

The legal basis which enables the Council to process your data for this purpose is consent from the data subject (you) under Article 6, paragraph (a) of the GDPR. Information provided will be stored in accordance with the Council's retention and disposal guidelines.

By completing and signing this form I agree to my name, name of organisation, and representations being made available for public inspection on the internet, and that my data will be held and processed as detailed above, in accordance with the Council's Privacy Notice:

Signature _____

A black rectangular box redacting the signature.

Date _____ 9th August 2021 _____



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PART B - Your representation

Please complete a separate Part B for each representation and return along with a single completed Part A.

Question 1: To which part of the Local Plan does your representation relate?

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Policy ECC05 Paragraph _____ Figure/Table _____

Policies Map designation Exclude land at Bury Farm from Green Belt (as per the attached location plan)

Question 2: Do you consider that this part of the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

- | | | |
|--|---|--|
| a) Legally compliant | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| b) Sound | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| c) Compliant with the Duty to Co-operate | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound, or fails to comply with the duty to co-operate.

Please be as precise as possible. If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this box to set out your comments.

The plan is considered unsound as it does not safeguard land to meet future development needs which could be beyond the current plan period.

The future need for housing and other uses such as employment and infrastructure such as a data centre in London may require the review of the Green Belt in sustainable locations.

Continue on a separate sheet if necessary

Question 4: Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect to the matters you have identified in Question 3 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The objection seeks a review of Green belt boundaries relating to land in the vicinity of Bury Farm east of the A41, south of the M1 and west of London Gateway Motorway Service Area.

It is proposed that this land (as shown on the location plan) is excluded from the Green Belt and is safeguarded for future development. The scale and uses could be a matter for a future local plan review.

Continue on a separate sheet if necessary

Please note:

In your representation you should summarise succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

Question 5: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing sessions?

Yes, I wish to participate in hearing session(s)

No, I do not wish to participate in hearing session(s) /
I am not seeking modification to the Plan

Question 6: If you wish to participate at the examination hearings, please outline why you consider this to be necessary.

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.

To explain why the Green Belt should be the subject of a review at Bury Farm to allow safeguarded land to meet future development needs.

Declaration of consent

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Signature _____



Date _____ 9th August 2021 _____

9 August 2021
L 210804 RAS LocalPlanReps



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Dear Sir/Madam

Barnet Local Plan - Regulation 19

Introduction

Savills is instructed to submit a local plan representation on behalf of All Souls College.

The representations seek an extension of the plan period consistent with the guidance set out in Paragraph 22 of the National Planning Policy Framework i.e. at least fifteen years from adoption of the local plan. This will have implications for the housing requirement set out in Policy BSS01.

The representation seek a review of the Green Belt in relation to land in the vicinity of Bury Farm east of Edgware Way (A41), south of the M1 and west of the London Gateway Motorway Services Area.

The representations seek the exclusion of this land from the Green Belt and the safeguarding of this land to meet future development needs.

The extent of the land is identified on the attached location plan. The site area is 142.87 hectares (353.03 acres)

Savills wish to participate in the future Local Plan Examination.

I have attached the relevant forms.

Policy BSS01 - Spatial Strategy for Barnet

The proposed policy provides for a minimum of 35,460 new homes in the period 2021 to 2036. This equates to a minimum of 2,364 new homes per annum and is consistent with the requirements of the adopted London Plan (March 2021).

Guidance in the National Planning Policy Framework (NPPF) in Paragraph 22 states that strategic policies should provide for a minimum period of 15 years from adoption. The Barnet Local Plan will not be adopted this year and may be adopted in 2022 at the earliest. The Council web-site states that the local plan is expected to be adopted in Autumn 2022.

To demonstrate a minimum period of 15 years from adoption, it is proposed that the plan period should be extended by at least 12 months to 2037 or later. An extension of the plan period would increase the minimum housing requirement and this should be incorporated into an amended Policy BSS01. An extension of the plan period by a minimum of one year could increase the housing requirement by a further 2,364 new homes to a revised total of 37,824 new homes in the period to 2037.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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An increase in the housing requirement may require the allocation of additional housing land in the local plan.

The objection to Policy BSS01 states that the minimum housing requirement should be increased to 37,824 for the period 2021 to 2037.

Policy ECC05 - Green Belt

The land in the vicinity of Bury Farm which is the subject of this local plan representation is designated as Green Belt in the adopted Local Plan (2012). This designation is carried forward in the current Regulation 19 version of the Barnet Local Plan.

The adopted London Plan (March 2021) seek to protect the Green Belt in Policy G2. Policy G2 also states that exceptional circumstances will be required to de-designate areas of Green Belt through the local plan review process. The adopted London Plan does not propose any strategic review of the Green Belt to meet future development needs.

The London Plan will be the subject of a review and that review may provide for a strategic review of the Green Belt.

Exceptional Circumstances

The land in the vicinity of Bury Farm provides a location for future development needs which could be considered through a future review of the local plan.

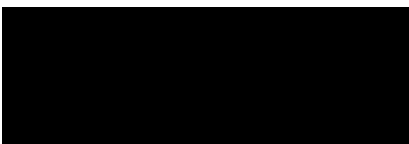
Such needs could reflect a contribution to the unmet need for housing across London, namely the shortfall of 14,000 new homes per annum which is the assumed difference between the objective need of 66,000 new homes and the assumed capacity to provide 52,000 new homes per annum.

Such needs could also reflect a contribution to meeting the future employment or infrastructure requirements, for example provision of a major data centre to help meet the computing needs of businesses and residents in London.

Those specific future needs cannot be identified at this stage.

The local plan objection to Policy ECC05 is that the land in the vicinity of Bury Farm should be excluded from the Green Belt and safeguarded for future development requirements which could be considered through a review of the local plan.

Yours faithfully

A large black rectangular redaction box covering the signature area.

Roger Smith
Director

cc. G Wordsworth - Savills

