



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?

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Policy ECC02" Paragraph 10.9.8 Figure/Table _____

Policies Map designation Indicate Dark Sky area on proposals map

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 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 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.

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Para 185 (c) of the NPPF states that development should “c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.”

This issue is not addressed by policy within the plan.

The All Parliamentary Group for Dark Skies in 2020 produced a report on “Ten Dark Sky Policies for the Government” which outlined some of the problems that light pollution can create including a literature review from Nature magazine in 2018 concluding that: “early results suggest that light at night is exerting pervasive, long term stress on ecosystems, from coasts to farmland to urban waterways, many of which are already suffering from other, more well-known forms of pollution”.

Continue on a separate sheet if necessary

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Add a new section after para 10.9.8 entitled "Dark Sky Barnet and Light Pollution"

Text to add including reference to NPPF, Dark Sky policy document from APPG on Dark skies and:

"The Council aspires to achieve Dark Sky status especially within the area to be designated for the regional park and across other green spaces within the Borough. To achieve this substantial work will be required to reduce levels of existing light pollution across the borough and ensure that new light pollution is eliminated. To this end the Council will prepare a light reduction plan covering the borough."

Add new section F to Policy ECC02: Environmental Considerations

F) to minimise light requirements externally and ensure that no light pollution is generated. The Council will also implement a light reduction plan across the borough in seeking to achieve Dark Sky Borough status.

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This is an emerging policy area which started in rural areas and is now generating greater interest in urban landscapes especially in light of growing evidence of the adverse impact of light pollution on insect numbers and biodiversity. It needs to be examined.

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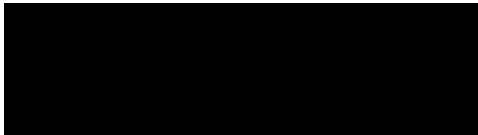
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Date 9th August 2021



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PART B - Your representation

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Policy new enforcement policy Paragraph 12.3.1 page 260 Figure/Table _____

Policies Map designation _____

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- | | | |
|--|------------------------------|--|
| a) Legally compliant | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| b) Sound | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
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<p>Enforcement is a key component of the planning regime and vital if good planning outcomes are to be achieved. The plan contains a statement at the para 12.3.1 which suggests a strong approach yet is very heavily caveated and should be strengthened along with the inclusion of a specific enforcement policy.</p>

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Amend Para 12.3.1 to read as follows:

"The Council ~~aims to~~ **will** ensure that **all** development complies with appropriate national and local planning policy and guidance through effective enforcement. ~~Where necessary,~~ The Council will use its powers to take planning enforcement action to ensure that unacceptable development built without planning permission or other consents does not compromise the delivery of the objectives set out in this Local Plan. The Council has a proactive enforcement team that carry out a large number of investigations each year and take legal action to ensure compliance with planning legislation as necessary."

Add new policy on enforcement:

Effective enforcement action will be taken by the Council in all cases where there is a breach of planning permission including noncompliance with conditions.

Continue on a separate sheet if necessary

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Policy New Strategic Policy GSS14 and policy ECC06 Paragraph _____ Figure/Table

Policies Map designation _____

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- | | | |
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There is need to recognise the emerging climate crisis and the adverse impact that climate change is and will continue to have on our wildlife and biodiversity. The plan needs considerable strengthening in this regard and does not fully take account of the growing evidence in this area and the rapid and wide-ranging changes that are needed to tackle the problems we will face in the plan period from a changing climate.

COP26 will take place following the end of the consultation period on the plan but it can be easily anticipated that this will throw out more evidence of the problems we will confront and issues we will need to address to rectify the situation.

Rewilding is one principled approach that is beginning to help to address some of the adverse impacts on our wildlife with examples at Knepp Estate in Sussex and the reintroduction of Beavers into the river systems at Tottenham and work in the adjacent borough of Enfield.

Continue on a separate sheet if necessary

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Introduce a new strategic policy on Rewilding GSS14

GSS14 Rewilding

Support will be given to all proposals where wildlife recovery and easy access to nature for people are at their heart. The intertwined ecological and climate crises will, in part, be addressed, by protecting land that's in recovery. A new designation - a Wildbelt – will be introduced, through the Barnet nature recovery plan, to appropriate areas in the Borough.

Residents and other stakeholders will be encouraged to engage in design and decision-making at all stages and will have the information they need to understand the impacts of plans on nature and on communities. Decisions will be based on accurate and up-to-date ecological data, with a full program of investment in place, as set out in the Infrastructure Development Plan, to gather, analyse and hold data appropriately.

Introduce addition to **Policy ECC06 Biodiversity** a1) supporting proposals for Wild belts, land specifically designated as places for nature recovery.

Add appropriate supporting text in para **10.26.5** "wild belts", will be designated which will be land protected from development and managed to allow the recovery of nature. A Barnet Nature recovery Plan will be prepared in the next 18 months in conjunction with local communities.

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Rewilding is a relatively new concept for planning and this needs to be explored and developed through examination to make it as strong as possible to ensure that we can begin to address some of the severe problems that the Climate Emergency is having on our wildlife and biodiversity.

most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.

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Policy _ECCO6 Biodiversity Paragraph Add new para (F) Figure/Table _____

Policies Map designation: Add B-lines to Proposals map and key diagram

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

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- | | | |
|--|------------------------------|--|
| a) Legally compliant | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
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The plan fails to recognise B-lines, promoted by Buglife as part of the Governments National Pollinator Strategy <https://www.gov.uk/government/publications/national-pollinator-strategy-for-bees-and-other-pollinators-in-england> One of the B lines in London crosses parts of the Borough including the New Southgate opportunity area.

B-Lines are an imaginative solution to the problem of the loss of flowers and pollinators; proposing action at a landscape-scale as advocated in 'The Natural Choice; securing the value of nature'. The loss of wildflower-rich grassland has been well documented; a 97% loss since 1930s which has played a major part in dramatic declines to our native pollinators (e.g. 66% large moths have declined, three quarters of butterfly species are in decline and there have been significant contraction in the ranges of wild bumblebees). The B-Lines networks are promoted as an approach to help restore populations of insect pollinators and to assist with the dispersal and movement in response to climate and wider environmental change.

<https://www.buglife.org.uk/our-work/b-lines/>

Continue on a separate sheet if necessary

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To make the plan sound the evidence that is available from HM Government via the Pollinator Strategy and the document "The Natural Choice" should be referenced in supporting text.

A new point (f) should be added to the Biodiversity Strategy to the effect that:

"f) ensuring that specific and detailed measures supporting pollinators will be required wherever development lies within B-lines in the Borough and in particular for proposals impacting on New Southgate."

Add references to B lines and the need to address them in all references to relevant site specific proposals including those in East Finchley and new Southgate that will be crossed by the B-lines.

Proposals Map

Add b-line extent as indicated on the website <https://www.buglife.org.uk/our-work/b-lines/> to the proposals map.

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This is a relatively new policy area that needs a proper hearing.

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Policy ECC04 –Barnet’s Parks and Open Spaces Paragraph ____(_e_)__ 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 x <input type="checkbox"/> | No <input type="checkbox"/> |
| b) Sound | Yes <input type="checkbox"/> | No x |
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Paragraph e) of Policy ECC04 seeks to allow limited development on areas that have been assessed by the Barnet Parks and Open Spaces Strategy as being of “low quality and Low value.”

The evidence base on which these assessments have been made is unsound, out of date and illogical. Does it relate to 44 or 111 spaces which are shown in different tables in the Study? The judgements made to make these assessments were wrong in 2016 and they are wrong today. Elsewhere in the plan Barnet recognise the value of “all” open space .

8.19.1 *Barnet’s open spaces and outdoor sports and recreational facilities are an important element of the Borough’s character and **all** contribute to health and wellbeing. **The importance of open space to access and enjoy during the COVID-19 lockdown has been highlighted by increased usage of Barnet’s parks and open spaces.** As Barnet grows there is a need to improve provision and plan for the creation of at least one new district park and 13 new local parks by 2040.*

And again: 8.17.1 *The COVID-19 pandemic has served to further highlight existing public health challenges and disparities in health and wellbeing. This includes interaction between people and the built and natural environment and access to local open spaces, **no matter how small***

With the Barnet population set to grow by 50,000 people over the plan period, this is not the time to be reducing the amount of open space available.

comments.

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To make policy ECC04 sound and based on evidence paragraph e) i) – iii) should be deleted as should the relevant supporting text at

para 10.19.3: First sentence.

Para 10.19.4 – 6 inclusive – delete all. Replace this text with up to date support for the value of “all” open space “however small”.

Further supporting evidence on the recognised value of all Green space can be found here:

Public Health England 2020

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904439/Improving_access_to_greenpace_2020_review.pdf

New Scientist 2021

<https://www.newscientist.com/article/mg24933270-800-green-spaces-arent-just-for-nature-they-boost-our-mental-health-too/>

WHO 2016

<https://www.euro.who.int/en/health-topics/environment-and-health/urban-health/publications/2016/urban-green-spaces-and-health-a-review-of-evidence-2016>

Warwick University 2019

https://warwick.ac.uk/newsandevents/pressreleases/green_space_is/

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This is a complex and contentious policy area locally which, if Barnet are not prepared to delete the relevant parts of the policy, needs to be rigorously examined and debated.

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Policy _ECC05 Green Belt and MOL_ Paragraph _____ Figure/Table _____

Policies Map designation Green Belt and MOL boundaries

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- | | | |
|--|---|-----------------------------|
| a) Legally compliant | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
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The Barnet Green Spaces Network strongly supports policies aimed at protecting all of Barnet's green spaces. Green Belt and MOL policies and boundaries in the plan have recently been the subject of a review which clearly sets out that the existing designated land meets the relevant criteria for designation and thus should be supported.

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.

No change.

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.

Others may wish to challenge the validity of current designations and seek changes and reductions in GB and MOL boundaries. If this is the case BGSN would wish to have the opportunity to contest those challenges in examination.

Declaration of consent

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__Date _8th August 2021__



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 _CDH01 Promoting High Quality Design 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 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 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.

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The policy is weak on seeking high quality design and thus fails to meet its stated goal. One area that is in strong need of strengthening to bring out quality is in respect of greening of developments which will be vital in the toolbox to tackle adverse climate change and to help improve biodiversity across the borough.

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.

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Amend Policy CDH01 Promoting High Quality Design .

Add following after the first sentence in para b) ... *Code for Small sites...* "Developments will contribute to the greening of Barnet by incorporating trees, green walls, green roofs, rain gardens and other green features and spaces into the design of the scheme."

Continue on a separate sheet if necessary

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The Design policies are weak and require significant strengthening is we are to 'build back better', tackle climate change, improve biodiversity and create future beautiful buildings and environments. Close examination of the entirety of this policy area needs to be undertaken.

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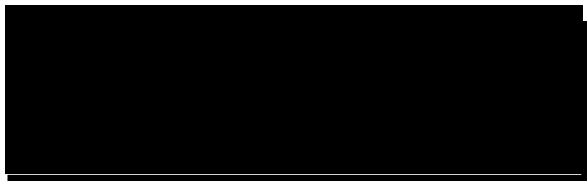
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Date 8th August 2021



Barnet Draft Local Plan
Publication Stage Representations Form

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PART B - Your representation

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

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Policy CDH07 Amenity Space and Landscaping a) ii) Paragraphs 6.22.7 and 6.25.7 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 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 type="checkbox"/> |

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There is inconsistency between the supporting text and policy prescription in respect of front garden parking. Supporting text gives the impression that front garden conversions to hardstanding will be refused where there is harm to character and appearance of a conservation area (6.25.7) and where garden development is considered to be detrimental to local character. (6.22.7) However this text is not followed through into policy prescription which is weak.

Front garden parking hardstanding not only creates these issues but where planning permission is required i.e. on classified roads safety issues also need to be taken into account for pedestrians and cyclists. Biodiversity is also often lost, and hardstandings contribute to increased surface water flooding. In the light of these issues a stronger policy prescription is called for.

Additional background on this subject can be found at:
<https://www.nationalparkcity.london/frontgardens> and
<https://frontgardens.nationalparkcity.org/>

Continue on a separate sheet if necessary

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Reword b) ii) to read: "Permeable, well designed and planted front gardens help reduce surface water runoff, increase biodiversity and add character to local neighbourhoods. Planning permission for parking in front gardens and other hardstanding will be refused.

Continue on a separate sheet if necessary

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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) x

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

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Parking in front gardens is a controversial issue and needs to be thoroughly examined and debated. It contributes significantly to surface water runoff and decreased biodiversity.

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Date 8th August 2021



Barnet Draft Local Plan
Publication Stage Representations Form

Ref: (For official use only)

PART B - Your representation

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

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Policy GSS13 Paragraph 4.28.4, ECC04 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 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 type="checkbox"/> |

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The population of the Borough is set to rise by 50,000 people during the lifetime of this plan. The concept of a new Regional Park has been around for at least 10 years and there is no sign yet of any positive movement to bring it to fruition. The recently released Infrastructure Delivery Plan makes no mention of the Regional Park. Warm words that the Borough will “promote a new regional Park” in both policies mentioned above will not make it happen. The impression is given that this idea is being batted off into the long grass.

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.

Firmer policy wording is required in both GSS13 and ECC04 to the effect that:

“A new regional park within designated Green Belt and/or Metropolitan open land in the Brent Valley and Barnet Plateau is a vital open space infrastructure element required to support the population growth of the Borough. A masterplan will be drawn up within the first three years of the plan period with an expectation that the park will be substantially complete by 2030.”

In addition the Infrastructure Delivery plan should include a clear commitment to the expenditure required to develop the regional park and an indication of where that money is likely to come from – probably CIL.

Continue on a separate sheet if necessary

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The Regional Park is a vital component of the infrastructure required to support the plan yet there appears to be a reluctance to ‘promote’ the Park and indicate a clear timescale for its completion.

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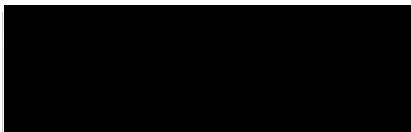
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Date 8th August 2021



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 New policy: London National Park City 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 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 type="checkbox"/> |

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The London National Park City is a movement to improve life in London working with residents, visitors and partners to:

Enjoy London's great outdoors more

Make the city greener, healthier and wilder

Promote London's identity as a National Park City

It is supported by the Mayor of London and one target is to physically seek to make London 50% green. The vision and aspirations of the movement should be reflected in the Barnet Local Plan which lacks ambition in this respect.

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.

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Proposed new Policy: GSS14 London National Park City

The Council supports the establishment of the London National Park City. Development proposals must avoid adding to the loss of nature and habitats in the Borough and instead aim to contribute to the capitals green-blue infrastructure when creating new or renovating existing built environment. The use of previously developed “brownfield” land whilst desirable also requires care and attention to retain particular natural features and species that have come to occupy them having been displaced from other locations.

Continue on a separate sheet if necessary

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The London National Park City is a relatively new area for planning policy and will need examination and discussion. The lack of ambition in the plan for high quality green design needs debate.

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Barnet Draft Local Plan
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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 ECC04 Paragraph _____ Figure/Table _____

Policies Map designation Site No. 32: 72-76 Manor Park Road East Finchley N2.

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 type="checkbox"/> | No <input type="checkbox"/> |
| b) Sound | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
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We oppose the development of this site for housing on the basis that the policy driver behind the scheme is the misguided notion that this is a site of low value/low quality as set out in Policy ECC04 and which we have made separate representations on elsewhere.

The evidence base on which these assessments have been made is unsound, out of date and illogical. The judgements made to make these assessments were wrong in 2016 and they are wrong today. Elsewhere in the plan Barnet recognise the value of "all" open space .

8.19.1 Barnet's open spaces and outdoor sports and recreational facilities are an important element of the Borough's character and all contribute to health and wellbeing. The importance of open space to access and enjoy during the COVID-19 lockdown has been highlighted by increased usage of Barnet's parks and open spaces. As Barnet grows there is a need to improve provision and plan for the creation of at least one new district park and 13 new local parks by 2040.

And again: 8.17.1 The COVID-19 pandemic has served to further highlight existing public health challenges and disparities in health and wellbeing. This includes interaction between people and the built and natural environment and access to local open spaces, no matter how small

With the Barnet population set to grow by 50,000 people over the plan period, this is not the time to be reducing the amount of open space available.

Continue on a separate sheet if necessary

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The amendment we seek is the deletion of Site No 32 from the list of developable sites. We would accept a policy proposal to improve the open space and increase biodiversity especially as the site lies long the northern Line a known wildlife corridor.

Continue on a separate sheet if necessary

Please note:

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Tied in with the representations we have made on ECC04 this is a site which demonstrates the misguided notion of low value/low quality and the unsound judgements that have led and could lead to more open space being lost. This needs to be aired at Examination.

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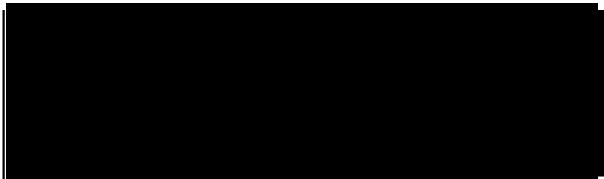
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A large black rectangular redaction box covering the signature area.

Date 8th August 2021



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 Strategy General – see attached paper Paragraph Various – see attached paper 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 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 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.

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NPPF para 22 was recently amended “to encourage local authorities to employ long-term thinking in developing their local plan visions, where appropriate, to enable sustainable development.

These proposals for a long-term vision for new settlements and major urban extensions were welcomed, and our consultation response set out that the Government would consider whether further clarification might be required in guidance to clarify the evidence base needed to support a 30-year vision”. (Letter Robert Jenrick (SoS) to CEO Planning Inspectorate 2nd August 2021)

Even if it is argued that this does not strictly apply to the Barnet Local plan, at this stage - although there is a debate to be had on that point - the existing 10-15 year strategy is not fit for purpose as it lacks ambition in order to deal with the very serious issues confronting us and in particular climate change and biodiversity loss. The overall strategy needs rethinking and indeed a 30 year horizon would be more appropriate in Barnet given the significant housing and population increases being promoted.

COVID related changes to behaviour are not yet fully understood. Clearer trends may be apparent by the time of the Examination and initial responses may need to be debated on that score as well.

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.

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Please see attached paper for a list of changes proposed to make the plan sound in strategic terms.

Continue on a separate sheet if necessary

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The current strategy of Barnet appears to dwell almost entirely on the housing numbers debate. It is not about creating sustainable communities but largely about creating large flatted housing estates. It lacks imagination and ambition on tackling major issues such as Climate change, environmental improvements to the Barnet landscape and generally improving the lives of all residents. This needs to be addressed through debate at examination.

most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.

Declaration of consent

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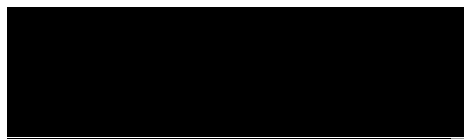
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Strategy – General Changes proposed to Plan

We would strongly encourage the Local Plan to be more ambitious. It is good to see environmental elements in lots of the plan but they are safe and low to mid level. The plan appears quite old fashioned and there is a real opportunity for it to be bolder and more ambitious.

The council should be competitively ambitious. Perhaps this should be done with a little carrot and stick! Stick – where is the risk register for Climate Change We see mention of flooding but less about buildings less able to cope with heat for example, storm damage, energy outages.... There are huge risks that should be included more comprehensively. Carrot – being opportunity to access investment, win awards, attract funding, green jobs – and actually transform the borough in the process of course!

The borough needs to become a beacon / leading example of green action.

Some top line suggestions:

- Linked to the Country/ London's announcement Barnet should declare a climate emergency – this should be front and centre (as Covid is in places) and frame the new policies around this
- Ambition to become London's most green borough *recognising it's not just the right thing to do for the environment but also for families, children, the heritage, appearance, budget and future of the borough*. Ideally push this even higher – UK's Greenest Council / Leading European Council

Bigger targets are required in the document – that will serve the borough well not just from an eco perspective but also in order to attract future Prizes/ Investment – e.g.

- Doubling Tree Canopy
- Doubling Wildlife
- Becoming litter free
- Being Carbon neutral by 2030 – aiming for zero carbon homes
- Sourcing all energy from renewables
- Add to B lines / Increasing Wildlife Corridors – *esp in respect to new developments – ensuring that wildlife corridors are kept / increased in face of new development*
- *Wise to include a school target as many schools want to do more – so could be a good extra win*

Chapter 2 – Challenges and Opportunities

2.6 – this should be framed (as the Covid section is) under climate emergency

Responding to the Nation wide and city declaration of Climate Announcement – consciously producing a plan ahead of COP26 in the UK – a clear ambitious declaration of the UK's desire to lead the way in mitigating Climate Change.

The ambition should be to lift Barnet from being one of the greenest to it being recognised, awarded and rewarded for being London/ UK's leading green borough. This should be achieved by setting 5-10 bold targets and across a range of the priority issues.

See suggested language in RED to insert into the document:

'Barnet aims to become a nationally/ globally recognised exemplar of how to achieve sustainable growth/ a sustainable future whilst achieving transformative response to the climate emergency. Maintaining the quality of the environment whilst delivering the levels of forecast growth is a key challenge for Barnet. Green growth will mean healthier happier lives for all residents and attract more investment and support to the borough, as well as enable the borough to be resilient and more efficient in face of future challenges Good growth also provides an opportunity to become more efficient and resilient, adapting to the consequences of environmental change created by human behaviour and mitigating the future impacts in particular flood risk and water quality from proposed development. Water supply and waste water management have both been assessed as part of the West London Alliance Strategic Infrastructure Delivery Plan (WLA SIDP).

A Stage 2 Strategic Flood Risk Assessment provides further support for the Local Plan's development proposals. Publication 19 June 2021 Barnet is one of the greenest boroughs in London. Green spaces and low density suburban development form an important element of Barnet's character. There is a challenge in protecting and enhancing this space and amenity value to residents. Barnet's Parks and Open Spaces Strategy 2016- 26 (BPOSS) provides evidence on existing open spaces that forms part of Barnet's Green Infrastructure network and its intrinsic value. **The borough will aim to become one of the first London boroughs to become carbon neutral by the end of this planning cycle – 2030. With the aim of achieving 75% reductions by 2030/ Global Goal target.** To make Barnet carbon neutral by 2050 the Council is progressing a **Transformational** Sustainability Strategy that sets out the actions we will take to deliver a green and thriving Borough; with a key focus on keeping neighbourhoods clean, green and with good air quality, ensuring that development and growth in the borough is sustainable, maximising reusing and recycling, and reducing consumption and waste. The London Plan outlines the Mayor's aspirations to become zero carbon by 2050 by increasing energy efficiency and maximising the use of low carbon energy sources in all stages of the development process, from design and construction to operation. An integrated approach to development should see all sectors coming together to achieve good growth alongside a healthy and attractive, low carbon environment, that can improve air quality, mitigate the impacts of climate change, enhance green infrastructure and encourage active travel.

Chapter 3:

Taking into account the challenges highlighted in Chapter 2 the Local Plan Vision is:

By 2036 Barnet has transformed into a dynamic globally/ nationally recognised borough where residents and business thrive in a greener, healthier and more dynamic environment of opportunity. By putting the climate emergency at the heart of our growth, Barnet will not only ensure a sustainable future for the borough but also create by 2036 one of the most, well planned sustainable and climate friendly boroughs and demonstrate how that growth can be delivered. The Borough aims to become the most family friendly borough, Growth has been directed into the most sustainable locations with good public transport and active travel choices. These include Brent Cross, Colindale, New Southgate and Mill Hill East as well as our main town centres at Burnt Oak, Chipping Barnet, Cricklewood, Edgware, Finchley Central, Golders Green and North Finchley.

Outside these locations, growth has been supported in places with capacity for change and where local character and distinctiveness are recognised.

Championing our natural environment at all times Getting the best out of our natural environment through expanding and improving access to green and blue infrastructure, delivering biodiversity net gain, **rewilding** and restoring the Borough's rivers to the benefit of people and wildlife whilst protecting our communities from flooding **and future climate unpredictability**. As a Borough that values its historic environment Barnet continues to be a place where people choose to make their home. Responsive and adaptable, Barnet's town centres have recovered from the COVID19 pandemic and thrive, with the efficient and sustainable use of their locational opportunities addressing the needs of a growing population: providing innovative business, leisure and cultural activities, at the same time as retaining their individual character. Barnet's improved orbital connectivity allows for a greater range of places where people can live, work or visit and provides for a greater range of sustainable transport options including cycling and walking for getting around the Borough. The positive benefits of growth and investment are accessible to Barnet residents, removing physical barriers to enable all to share in new social and community infrastructure and access a range of housing types and a thriving jobs market while enjoying living in a safe, healthy and sustainable Borough.

Encourage Community buy in /engagement with this work – overall the sustainability/ greening policies should be included in Section 8 – Community Health And Wellbeing linked to <https://www.nationalparkcity.london/> aims for healthier, greener, wilder city for people to live in

Targets for schools and business groups to be represented

Should also be included in **section 9 / Economy** – space for green jobs – putting sustainability front and centre including rewilding should bring new green jobs as well as provide a better working environment

In section 10....

10.14 Barnet's three designated water bodies under the Water Framework Directive (WFD) are: the Silk Stream and Edgwarebury Brook; the Dollis Brook and Upper Brent; and the Pymmes Brook upstream Salmon Brook confluence. These are all classified as having **moderate ecological potential, with water body objective potential for good status by 2027 according to the 2019 WFD Classification**. The Council will work with the Environment Agency and developers to **achieve the potential of Barnet's water courses being classified as 'good ecological potential'**. This **(needs to be become bolder – it must reach the highest classification level by 2027)** may involve reducing levels of urban runoff and removing invasive species from the water courses. New development must be efficient in using water, seeking wherever possible to reduce consumption as set out in Table 20. This can be achieved through grey water systems and rainwater harvesting. Further details on recommended technologies are set out in the Council's suite of design guidance SPDs. **(If a 'good ecological level' is all that is being pursued it suggests that the recommended technologies and suite of design guidance SPDs are not up to scratch.)**

10.15 Barnet's rivers have been hugely altered from their natural state. Culverting of watercourses can exacerbate flood risk, increase maintenance requirements, and destroy wildlife habitats. Hence, the Council strongly discourages any proposals that include any new additional culverting of the watercourses and only considers it, if alternative options have been explored and there is no reasonably practical solution. **Wherever possible, Barnet will aim to rewild and restore its** rivers and

watercourses should be de-culverted and restored to a more natural state in order to improve biodiversity aiming to at least double biodiversity by 2036, improve water quality, provide a haven for nature and residents alike and help reduce the speed of run off. Buildings should not be sited over the top of new or existing culverts/ordinary watercourses.



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PART B - Your representation

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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 CDH07 Amenity Space and Landscaping plus new policy Paragraph _____

Figure/Table _____

Policies Map designation New designation – Great North Road hedge 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 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 type="checkbox"/> |

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The importance of trees is lost within this policy and the value of ancient woodland, veteran trees and hedges is not recognised. London Plan Policy G7 Trees and Woods says that Boroughs in their development plans should 'protect veteran trees and ancient woodland and identify opportunities for tree planting in strategic locations. This is not done in the Barnet Plan and this inadequacy should be addressed.

In terms of proposals the Great North Road Hedge (see separate sheet) would look to ensure that major thoroughfares through the Borough would be green, offer shade in terms of minimising the heat island effect of Climate Change and be a major boost to tackling the impact of air pollution.

Continue on a separate sheet if necessary

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Remove item iv) from policy CDH07. Create new policy:

CDH07A Trees, woodland and hedges

Development proposals must protect all existing trees and hedges and safeguard their root systems during development. Additional trees, hedges and vegetation should be incorporated wherever possible.

Veteran trees and ancient woodland will be protected, and their conservation and long-term management supported.

Add **Great North Road Hedge** (see separate sheet) to proposals map and include new paragraph in section on Trees, woodland and hedges: The Council supports the concept of the Great North Hedge running along the A1/A1000. Joining Communities. Plant, insect, bird, animal and human.

The proposal would eventually link London to Edinburgh along both the A1 and A1000 by way of hedge, tree and wildflower planting in fields, school grounds, parks, and open spaces together with buildings using green walls, roofs and green infrastructure will join plant, insect, bird, animal, and human communities across the country.

Running through urban, suburban, and rural communities the hedge would help to tackle air pollution, create habitats for wildlife and educational study. It will engage communities. It will involve, schools, local authorities, private sector organisations, Friends of Parks groups, wildlife organisations, other voluntary and community groups in a common endeavour to create a continuous green corridor.

Continue on a separate sheet if necessary

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Trees and woodland are an important element of Barnet and need protection. Their importance and the proposal for a Great North Road Hedge needs to be emphasised and the case made at examination.

Declaration of consent

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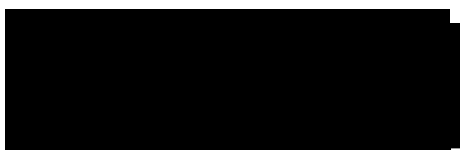
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Policy: Create New Policy GSS14 Paragraph _____ Figure/Table _____

Policies Map designation _____

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Within some policies e.g. GSS02 and town centres policy there is some support given to “meanwhile uses” though in the glossary and supporting text the emphasis is on Temp use of sites for housing. However, the approach is not a general one across all sites in the borough and this requires amendment. Thinking in this area is developing fast and recent publications such as the Arup report Meanwhile Use for London demonstrates how this policy can be taken forward as a contribution to COVID recovery. It is an especially important area for creating temporary additional open space, growing space, parklets etc which will assist in COVID recovery and engage with local communities.

Continue on a separate sheet if necessary

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New Policy GSS14 Meanwhile Uses

Meanwhile uses for vacant buildings and land across the borough will be supported. The Council will work with landowners and local communities to encourage the use of such sites for a range of meanwhile uses including open space, food growing spaces and parklets as well as temporary housing.

Include additional **supporting text** and note on:

Engaging with the community;

Developing a database of meanwhile sites and looking to marry them up with alternative users.

Funding opportunities available for developing meanwhile uses.

Glossary

Review glossary definition to include references to open space and growing space provision.

Continue on a separate sheet if necessary

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Meanwhile Uses policy has been developing quickly and in response to the COVID pandemic. This is the opportunity to get the policy right and make it relevant across Barnet and not just in specific areas of the plan. This should be subject to examination.

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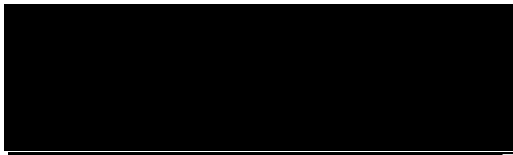
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