From: Barnet Labour Councillors <

Sent: 09 August 2021 21:37
To: Forward Planning
Cc: Labour Cllrs

**Subject:** Labour Group submission to draft Local Plan consultation

Attachments: 200315\_BSoc\_LBB\_Local\_Plan\_response.pdf; Barnet Green Spaces Network Local Plan

Submission.docx

I enclose below a submission from the Barnet Labour Group of councillors to the draft Local Plan consultation.

Please confirm receipt,

**Cllr Ross Houston** 

Deputy Leader of the Labour Group and spokesperson for Housing & Growth

# Labour Group submission to Draft Local Plan (Reg 19) Publication consultation#

The Labour Group voted against the draft Local Plan at Committee. The document has some merit in places, but lacks ambition on climate change, protection of green space, and protection of the Borough against mass overdevelopment.

We agree with many of the comments made by the Barnet Green Spaces Network in their submission, and we largely agree with the Barnet Society submission made earlier this year (both attached).

Our main objections to the draft Local Plan are below, although these are not exhaustive.

#### Overdevelopment, density and height

The document does not go far enough to protect the Borough from over-intensification, inappropriate density and inappropriate height of new buildings - especially in town centres which in Barnet are suburban in nature. The policies around these issues are not robust enough. Barnet is already seen as a soft touch by developers, and we have seen completely inappropriate planning applications submitted in a large number of locations as a result - Homebase in North Finchley is just one of them. We are extremely concerned about the effect that a weak Local Plan will have for the future of Barnet.

The draft Local Plan suggests that super tall buildings of up to 25 storeys will be allowed in some town centre locations - this is unacceptable. Equally, tall buildings of up to 14 storeys in some town centre locations are also not acceptable. Maximum heights should be much lower, and not left to a separate SPD on height and tall buildings, which will not be taken as seriously as the Local Plan by developers. The Local plan should specify the maximum height and reiterate this in the SPD.

The Schedule of Site Proposals is unacceptable in many places, and we cannot agree to the overdevelopment proposed in this schedule. The supply of sites for 46,000 new homes within the document is too high, and the lower London Plan target of 35,460 should be used (2,364 p.a.).

Also, the Government are likely to impose their own target of 5,000 new homes a year - clearly this is ridiculous and unacceptable.

## **Population**

On the basis of current projections up to 2036, Barnet's population is expected to reach 452,000. [from 400,000 now]. However, London is now predicting a fall in population, mainly inner-city, our projections should not be based on old figures, we should wait for the 2021 census figures which will be available next year. A caveat should be added to the document, therefore, that the housing target could be reduced if the new projections show a smaller rise or even a fall.

## **Gambling**

The plan is far too weak on restricting casinos and other adult gaming centres in our high streets and town centres and controls need to be significantly stronger. The Planning Inspector appeal decision was clear about this in relation to the Merkur Slots outlet in Finchley Central. The Inspector said:

"The Council has raised concerns on the effect of the proposal on the Finchley Town Centre Strategy 2017, particularly the ambition to create 'Finchley Square'. However, little specific detail has been submitted to demonstrate that the proposal would hinder such aspirations being delivered. I have considered this appeal proposal on its own merits and concluded that it would not cause harm for the reasons set out above."

Unless we provide robust policies in the Local Plan and have SPD documents that reinforce these policies, Barnet will see the proliferation of gambling outlets which the Council will be powerless to prevent.

#### Design

Development is always controversial, whatever the size of the scheme. The document needs better developed policies on co-design with local people to ensure that development is what people actually want.

LB Enfield has a Design Review Panel in its local plan. Barnet's Local Plan should emphasise the importance of good design in delivering density without high rise and in protecting the suburban and historic character of parts of the borough.

The Characterisation Study needs to be revised - the main study was done in 2010, and it insufficiently protects suburban character.

# **Green spaces**

There must be more robust protection of green and open spaces and the greenbelt. The Council's Parks & Open Spaces Strategy is clear about the intention of building on green and open spaces - particularly on those deemed 'low quality, low value'. This category is unacceptable and should be scrapped. All Barnet's green and open spaces should be protected from development that is not park or leisure related. The Council's budget still has a budget headline included for building solar farms and batter storage units on 'low quality, low value' open spaces. This budget headline should also be scrapped - green and open spaces are not the appropriate place for solar farms and battery storage units, the Council's brownfield estate could accommodate this more appropriately.

We also support many of the comments made in the submission by the Barnet Green Spaces Network (copy attached).

### **Climate change**

We agree with the Barnet Society's submission earlier this year that stated:

"This, Policy ECC01 (Mitigating Climate Change) and related draft Policies are well intentioned but do not go far enough. For example, although there are statements about carbon reduction they refer entirely to emissions in use, there is no mention of the equally important need to reduce embodied carbon. Nor are many meaningful standards set with regard to energy, emissions or waste, either in the draft Plan or in the Council's SPD on Sustainable Design and Construction. And the only reference to promoting a circular economy is a reference to Policy S17 in the London Plan. The simplest way of reducing the very substantial environmental impact of new construction is to minimise demolition and new building. Instead, the Council should encourage retention and adaptation of existing buildings wherever practicable."

The Labour Group does not believe Barnet Council has any sense of urgency when it comes to climate change, and actions do not go far enough to deal with it.

One small example - the document commits the Council to zero carbon by 2050 - the London Plan target is actually 2030.