



**Barnet Draft Local Plan**  
Publication Stage Representations Form

Ref:   (For official use only)
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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?**

*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 GSS01 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.**

*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.*

Clarification is needed as to whether (1) in paragraph 1, the 27,000 new jobs are net or gross, and (2) in paragraph 5, why the list of areas totals an unrealistically ambitious 46,200 new homes when the New London Plan target is 35,460.

We also support the views submitted by the Federation of Residents' Associations of the London Borough of Barnet (FORAB).

**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.**

Clarify the basis of (1) & (2) above.

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N/A

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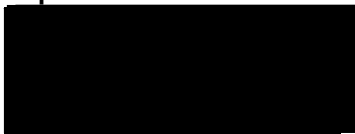
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**Date** 7 August 2021



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Policy BSS01 Paragraph \_\_\_\_\_ Figure/Table \_\_\_\_\_

Policies Map designation \_\_\_\_\_

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

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- |  |                              |  |
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This proposal is unsound for several reasons.

The proposed sport and recreation hub on Barnet Playing Fields comprises a building as big as a small primary school plus a floodlit outdoor games area and parking for 65 cars, right in the middle of the playing fields. This would be a flagrant breach of the openness of the Green Belt.

We dispute that the proposal is justified by 'very special circumstances'. The proposed hub would replicate sport and recreation facilities already available for community use at the nearby Totteridge and Ark Pioneer Academies, and therefore be poor value for money.

We also question whether demand exists for additional provision on this scale. Even if that could be demonstrated, it would be unnecessary to build on this precise site since other less open, far less conspicuous – and probably cheaper and more convenient – sites exist close by.

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Radically downsize the proposed sport and recreation hub and/ or relocate it to a less intrusive site on Barnet Playing Fields, or omit it altogether.

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Yes – because the Barnet Society has consistently challenged the rationale and scale of this proposal, and the validity of its location in the Green Belt.

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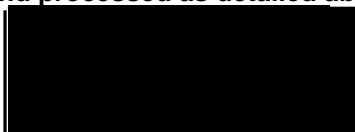
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Policy GSS08 Paragraph \_\_\_\_\_ Figure/Table \_\_\_\_\_

Policies Map designation \_\_\_\_\_

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- |  |                              |  |
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<p>The planned figure of 5,400 new homes seems low if a town centre area is deemed to extend 800m from its centre, as we understand from informal communication between planners and the Federation of Residents' Associations of the London Borough of Barnet (FORAB).</p>
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Clarification is needed of the basis for the figure of 5,400 new homes in town centres.

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N/A



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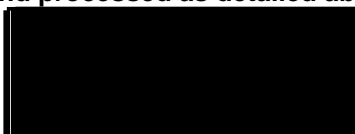
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Policy GSS09 Paragraph \_\_\_\_\_ Figure/Table \_\_\_\_\_

Policies Map designation \_\_\_\_\_

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- |  |                              |  |
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In the last paragraph of the policy regarding development of car parks at existing transport hubs, a distinction must be made between stations at the end of a line or on the edge of the TfL area and stations closer in. Outer London and Hertfordshire commuters to London are drawn to High Barnet and New Barnet Stations because over recent decades bus services have atrophied or disappeared altogether, creating extra demand for car use and parking at and around those stations.

Wholesale removal of parking at High Barnet and New Barnet Stations would be counter-productive, displacing cars onto local streets and discouraging car-sharing and other integrated transport solutions.

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Recognise the distinction between stations at the end of a line or on the edge of the TfL area and stations closer in in the Local Plan.

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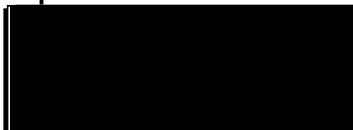
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Policy GSS12 Paragraph \_\_\_\_\_ Figure/Table \_\_\_\_\_

Policies Map designation \_\_\_\_\_

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- |  |                              |  |
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We are concerned that the need for car parking in edge-of-London locations may be greater than elsewhere in Barnet, because centres such as Chipping Barnet have to compete with Potters Bar, Hatfield, London Colney and Borehamwood, which are easier to reach by car. This is likely to be exacerbated by the major developments around the M25 being proposed by Hertsmere.

We also support the views submitted by the Federation of Residents' Associations of the London Borough of Barnet (FORAB).

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Require transport assessments for edge-of-London locations to factor in developments outside the borough boundary.

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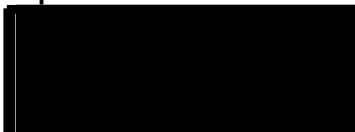
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Policy HOU02 Paragraph \_\_\_\_\_ Figure/Table \_\_\_\_\_

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We share the concern of the Federation of Residents' Associations of the London Borough of Barnet (FORAB) that Barnet is becoming over-provided with one and two-bedroom units.

We also believe that encouragement should be given to more varied – and newer – forms of tenure, e.g. co-housing.



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The policy needs a clearer requirement for a greater proportion of family homes, and encouragement of more diverse forms of tenure.

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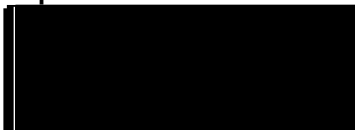
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**Signature**

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**Date** 7 August 2021



**Barnet Draft Local Plan**  
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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?**

*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 HOU03 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.**

*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>We share the concerns of the Federation of Residents' Associations of the London Borough of Barnet (FORAB) that this policy, as currently worded, will not be effective in resisting the trend towards smaller family homes.</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.**

Make definitions of larger homes more rigorous.

**Continue on a separate sheet if necessary**

**Please note:**

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N/A

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Policy CDH01 Paragraph \_\_\_\_\_ Figure/Table \_\_\_\_\_

Policies Map designation \_\_\_\_\_

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We support the views submitted by the Federation of Residents' Associations of the London Borough of Barnet (FORAB) that design guidance in Barnet is currently insufficiently clear and consistent.

On a point of detail, although clause (b) explicitly mentions biodiversity, water management and sustainable drainage, energy saving does not feature in the policy itself.

**Continue on a separate sheet if necessary**

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There must be a clear statement about the value of timely design review and the role of local design codes, not simply for small sites.

Explicit mention of energy saving would also be helpful.

**Continue on a separate sheet if necessary**

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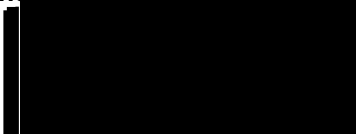
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Policy CDH04 Paragraph \_\_\_\_\_ Figure/Table \_\_\_\_\_

Policies Map designation \_\_\_\_\_

**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"/>            |
| b) Sound                                 | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
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We agree with the comments of the Federation of Residents' Associations of the London Borough of Barnet (FORAB), particularly in relation to the need for a more nuanced and localised definition of tall buildings that would protect low-rise neighbourhoods, where anything over four storeys might appear tall.

In many parts of Chipping Barnet, blocks of 6-7 storeys would seriously intrude into views from nearby open spaces and the Green Belt. Green 'lungs' that separate neighbourhoods and give them identity are particularly vulnerable in this respect. Cases in point are TfL's proposed row of slabs lining Barnet Hill, blurring the distinction between the hill-top settlement and the low-rise suburbs of Underhill and Oakleigh, and Fairview's proposed blocks looming over Victoria Recreation Ground.

A critical point not addressed in the policy is the detrimental effect of tall buildings sprinkled across the borough. One of the pleasures of parts of Barnet is the illusion of countryside. The upper Dollis Valley is a good example, where only Barnet House and Angle House currently interrupt the green horizon. If additional towers are allowed to straggle randomly along the A1000, this effect would be destroyed.

**Continue on a separate sheet if necessary**

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Produce guidance, in the proposed SPD on Building Heights or elsewhere, to protect low-rise neighbourhoods from buildings that are lower than eight storeys but incongruous with their locality.

Designate locations where clusters of tall buildings would be permitted, with substantial distances between clusters.

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N/A

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**PART B - Your representation**

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Policy ECY01 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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We support the view submitted by the New Barnet Community Association that this policy is insufficiently visionary about job creation.
--

**Continue on a separate sheet if necessary**

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We agree with the New Barnet Community Association that the Local Plan should be more proactive and imaginative, for example linking provision of new kinds of jobs and new kinds of homes.

**Continue on a separate sheet if necessary**

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Policy ECC04 Paragraph \_\_\_\_\_ Figure/Table \_\_\_\_\_

Policies Map designation \_\_\_\_\_

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This Section of the policy depends entirely on a fundamentally flawed set of assessments in the Parks and Open Spaces Strategy (P&OSS). Its scoring and weighting methodology was challenged during the prior public consultation. Some of its assessments are bizarre: 'low quality and low value' spaces included, for example, Hadley Wood – surely one of the Borough's most precious natural assets.

Within the last year, in response to vociferous local objection to certain assessments, the Council has publicly modified its stance on 'low quality, low value' spaces. At Highlands Gardens, it has assured residents that development in the form of solar panels would not be considered after all, and at Tudor Sports Ground it has awarded £200k of funding to the restoration of the derelict cricket pavilion. In both cases, Councillors and Officers indicated that the P&OSS assessments were not helpful and needed review.

Since neither Council nor public have confidence in the assessments, the policy (in its present form) would command little respect, and its adoption would weaken trust in other policies in the Local Plan.

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Section (e) should be reworded along the following lines:  
*Green spaces listed in the Barnet Parks and Open Spaces Strategy should be considered for development only under very exceptional circumstances...[criteria i-iii].*

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Yes – because the Barnet Society is familiar with the flaws of the Parks and Open Strategy, having analysed its methodology and assessments in detail during public consultation, and has been involved in subsequent cases when both methodology and assessments have been challenged.



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Policy GSS01 – site no. 44 Paragraph \_\_\_\_\_ Figure/Table \_\_\_\_\_

Policies Map designation \_\_\_\_\_

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<p>We generally support the building of some housing and upgrading of the public realm on this site. But a great opportunity to reconfigure High Barnet as a transport modal interchange is being lost. We are also highly critical of the overbearing mass of 6-7 blocks proposed (see also our comments on policy CDH04). And we have serious reservations about the loss of so many car parking places (see also our comments on policies GSS09 &amp; 12). In our view, the indicative residential capacity of 292 dwellings is greatly over-optimistic.</p>
---

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The quantity of proposed homes should be significantly reduced and the number of car parking spaces increased.

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N/A

**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.

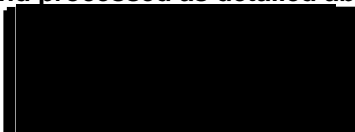
Your details will be kept in accordance with the Council's Privacy Notice, until the Local Plan is adopted plus a further five years to evidence that a fair and transparent process has been followed. Processing is kept to a minimum and data will only be processed in accordance with the law. We will take 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 large black rectangular redaction box covering the signature area.

**Date** 7 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 GSS01 – site no. 45 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.**

*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 proposal is unsound because it is in flagrant breach of Barnet Council's own policies regarding Conservation Areas and open spaces, as well as the Mayor of London's environmental and farming policies.

We are also opposed to the building of so many homes on this site, and wish to see more imaginative use of the open space, preferably for educational, therapeutic and food production purposes.

**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 site should be allocated a fraction of the proposed number of homes, or omitted altogether.

**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.*

Yes – because the Barnet Society has played a leading role in opposing development of this type and scale, which contributed to the refusal of the planning application in November 2020.

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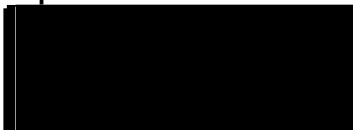
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**Signature**

A black rectangular box redacting the signature of the respondent.

**Date** 7 August 2021