



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 **GSS03** _____ 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.

Bestway generally supports the draft Local Plan's approach towards the Brent Cross West Growth Area (as set out in Policy GSS03). However, the policy includes prescriptive requirements for the redevelopment of the area, which are yet to be tested through detailed analysis (in this regard the policy suggests that further work will be set out in a more detailed planning framework for the area).

Bestway's specific concerns relate to the draft policy's cap on the amount of new homes could be accommodated in the growth area (set at 1800 homes) and the requirement for development to provide a comprehensive scheme for the improvement of the junction between the A5/Edgware Road and the A406/North Circular.

In addition, the policy lacks the clarity (set out in Para 4.16.8) that contributions towards infrastructure improvements (such as the A5/A406 junction) will need to be proportionate to the scale of development.

Without supporting evidence which specifically justify these requirements, greater flexibility should be built into the policy concerning the level of development that is acceptable in the growth area.

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.

To be sound, Policy GSS03 needs to allow greater flexibility in terms of the level of development acceptable on the site, as well as how infrastructure will be delivered.

In this regard the policy (first bullet point) should be amended to read:

- **“Approximately 1,800 new homes with the potential to increase further upon delivery of the West London Orbital (WLO) and/or subject to sound planning justification that an increased number of homes is acceptable”.**

In addition, the fourth bullet point should be amended to read:

“Development Proposals should contribute proportionally towards the delivery of a scheme for the improvement of the junction between the A5/Edgware Road and A406/North Circular supported by Transport London in relation to the TLRN”.

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.

Given Bestway's significant ownership of land within the Brent Cross West Growth Area and the company's aspiration to deliver a high-density mixed use development on this land.

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.

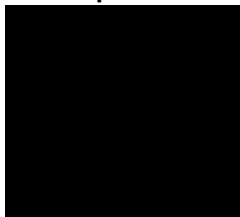
Your details will be kept in accordance with the Council's Privacy Notice, until the Local Plan is adopted plus a further five years to evidence that a fair and transparent process has been followed. Processing is kept to a minimum and data will only be processed in accordance with the law. We will take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

Signatur



Date 09/08/2021



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

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Policy _____ Paragraph **4.16.6** _____ 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.

- | | | |
|--|------------------------------|--|
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The paragraph refers to the “need to widen and upgrade” Geron Way “to accommodate new and extended bus services to the new interchange and Brent Cross West as well as access to the future West London Orbital station”. However, no evidence is presented in the Local Plan which supports or justifies this specific requirement.

In this regard, discussions which Bestway have had with Barnet Council planning and regeneration officers have indicated that there may be no need for buses to travel along Geron Way to access the new railway station, but instead buses may be able to service the station using existing bus stops on Edgware Road..

Therefore the paragraph should include flexibility on whether buses are required to travel along Geron Way.

Continue on a separate sheet if necessary

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Paragraph 4.16.6 should be amended to allow flexibility on the need to widen Geron Way to accommodate buses, which will only be known after more detailed analysis is undertaken.

The paragraph should be amended read:

“Subject to further analysis, it may be necessary to widen and upgrade Geron Way to accommodate new and extended bus services to the new interchange and Brent Cross West as well as access to the future West London Orbital station”.

Continue on a separate sheet if necessary

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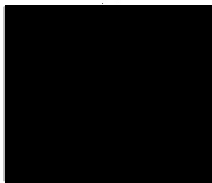
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Signature



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