



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 __CHW02 – Promoting Health and Wellbeing; ECC01 – Mitigating Climate Change; ECC02/2a Environmental Considerations and Water Management; ECC06 Biodiversity_____

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.*

These comments relate to policies listed above and the Council's planning objectives of:

- Promoting healthy living and well-being
- Enhancing and protecting our green and natural open spaces
- Delivering an environmentally sustainable LBB that is resilient to climate change

The comments also relate to the Council's responsibilities for, and concerns about:

- Flooding and water management
- Habitat loss
- Urban cooling/carbon capture

The Council's Green Infrastructure SPD list of 'green assets' (p9, table 1) includes private gardens. Each year a large number of planted front gardens are lost and replaced by paved driveways. I do not have statistics, but **the volume of biomass lost in this way each year must be significant in the Borough, and more widely, across London.** This loss has consequences for:

- increased run-off/flooding
- reduced CO2 capture through loss of plant biomass
- air quality
- increased urban space temperatures
- loss of habitat for insects, especially pollinators, birds and other wildlife,

It is important to understand that front and rear gardens, even small ones, provide habitats for flora and fauna which help to create bridges between the more significant areas of green infrastructure listed in the SPD. Thus, even though they are not publicly accessible, gardens play a significant role in maintaining and sustaining the borough's living environment.

There is also an aesthetic element to creating paved areas as streets with forecourts instead of front gardens lose their 'traditional' suburban look.

I understand there is a current requirement for planning permission where more than 5 square m. of front garden is paved but that this relates to drainage requirements rather than considerations of environment/climate change.

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.

Suggestion 1:

As a contribution to reducing flooding, improving air quality, preserving biomass and habitat, and reducing urban heating the Council could impose requirements to retain planted front gardens, or at least larger proportions of front gardens, when applications to pave them over are submitted.

Suggestion 2: For similar reasons, the Council could set out stronger requirements relating to planting around new developments when they grant permission for either new build or redevelopment of existing sites.

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.

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

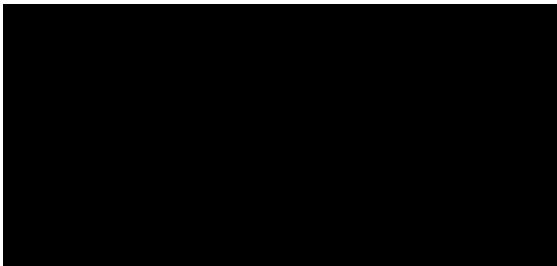
of the preparation of the Local Plan as required by the Planning and Compulsory Purchase Act 2004 (as amended), and may be used by the Council to contact you if necessary, regarding your submission. Your name, name of organisation, and comments, will be made available for public inspection when displaying 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 _____ by e-mail _____ Date 30 July 2021 _____

[REDACTED]
telephone [REDACTED]

e-mail [REDACTED]

Planning Policy Team,
7th Floor,
2 Bristol Avenue,
Colindale,
London, NW9 4EW

27 July 2021

Draft Local Plan (Reg 19) Publication consultation

I should be grateful if you will take into account the following comments. They relate to the Council's planning objectives of:

- Promoting healthy living and well-being
- Enhancing and protecting our green and natural open spaces
- Delivering an environmentally sustainable LBB that is resilient to climate change

The comments also relate to the Council's responsibilities for, and concerns about:

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Thank you for your consideration of this matter.

By e-mail

(Dr.) Arthur Fleiss