

## 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 Paragraph 2.3.1 Figure/Table  
5

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 checked="" 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 checked="" 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 Whilst we accept that with smaller homes being built and an element of 'hidden' homelessness that will reduce*

2.3.1 indicates population growth from the current around 400,000 to 452,000 by 2036. We understand current the occupancy level per home is 2.6. We recognise that with smaller homes being built occupancy levels will be lower but It is difficult to envisage that the occupancy rate for new homes will be less than 2.0. This will be especially true for market homes as prices largely dictate that affordability can only be achieved with two incomes.

So for a target of 46,000 new homes occupancy is unlikely to be less than 92,000, or for the minimum target of 35,460 homes occupancy would be a minimum of 71,000. We recognise there is an element of 'hidden' homelessness that will result in numbers of such people occupying some of the new homes and thus reduce occupancy levels in existing homes. However there remains an immense disparity between an expected population growth of some 50,000 and 46,000 additional homes which, even with an average of two bedrooms, could house a minimum of 115,000 people.

**Continue on a separate sheet if necessary**

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We appreciate the SHMA assessment provided the basis for the 46,000 homes figure, but it is poorly explained. The population growth/ new housing relationship is fundamental to the Plan. For the Plan to be sound this needs a full explanation justifying why 46,000 homes are needed.

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We wish to ensure the Council is pressed to justify the population/housing target figures

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Signature G.Massey\_for FORAB Date 8 Aug 21

## Barnet Draft Local Plan

### Publication Stage Representations Form

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#### PART B - Your representation

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Policy \_GSS01\_ page 41 \_\_\_\_\_ Paragraph \_\_\_\_\_ Table 5 \_\_\_\_\_

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

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- |  |   |  |
|--|---|--|
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The total number of homes reflects a target of 46,000 over 15 years. This figure was the working assumption in the January 2020 draft of the Plan, which itself reflected the target then in the draft London Plan. As a consequence of the recommendation following the Examination In Public the London Plan targets were reduced, with the minimum target figure for Barnet reduced to 23,640 over 10 years, which grossed up over 15 years is 35,460. Thought 35,460 is quoted in Barnet's Plan as a minimum, 46,000 remains as the objective.

We find the retention of the 46,000 target odd. The London Plan EIP in effect found this target unsustainable yet Barnet has retained it. We certainly have doubts whether 46,000 is anywhere near achievable, and as we have indicated, this appears to be aimed at accommodating far more people than the projected population growth. Two figures serve to confuse, and the higher figure is unnecessary

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To be sound the Plan should present a single easily understood target figure and that what is considered achievable in the London Plan – a minimum of 35,460

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The council needs to be pressed to explaining why it has created the muddle of using two target figures.

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Signature \_\_\_\_\_ **G. Massey** for FORAB \_\_\_\_\_ Date **8 Aug 21** \_\_\_\_\_

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Policy \_GSS08\_\_\_\_\_ Paragraph \_page 66\_\_\_\_\_ Figure/Table  
\_\_\_\_\_

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

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In other documents Barnet's town centres are very narrowly defined as encompassing the retail areas only. So on the face of it the target new homes figure seems excessive. We have however now been led to understand the definition of town centres for the purposes of the Plan extends to 800m beyond the retail boundary. This does make more sense but there may be overlap with target figures in other categories, e.g Woodside Park station (see GSS09),

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The definition of the area encompassing the town centre target should be made clear and figure checked to ensure there is no duplication with targets under other headings

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Policy \_GSS09\_\_\_\_\_ Paragraph \_page 70\_\_\_\_\_ Figure/Table

\_\_\_\_\_

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

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There is a presumption that existing transport hubs have potential for growth without any evidence to assess whether the public transport provision will have the capacity to meet additional demand. The potential to provide extra train capacity on the two branches of the Northern Line is very limited yet several thousand new homes are earmarked for locations along both branches (including Finchley Central station, Mill Hill). Edgware and Colindale) will be significant here yet are not mentioned in this policy.

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An assessment should be included in the Plan of the potential extra traffic on the two branches of the Northern Line and Thameslink and the capacity of the trains to cope with this extra traffic.

See also related comments on policy TRC02

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The adequacy of additional transport provision to cope with rising demand is critical to the Plan and needs far more attention than the vague assessment provided. This policy is solely focused on housing numbers without any support is assessing the necessary transport infrastructure. The Council should be pressed to provide much better and convincing analysis..

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Policy \_GSS12\_ Paragraph \_page 77\_ Figure/Table

\_\_\_\_\_

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

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This policy is bullish about redevelopment of car parks. We recognise that, on the face of it, they do represent inefficient use of land in prime locations. But the council is also committed to supporting the commercial well-being of town centres, which have endured many difficulties over recent years. So there is a potential conflict.

The second bullet point in the policy indicates that development will be supported if it can be demonstrated "how the use of public transport and active modes will lead to reduced car park usage". It is obvious that if alternative uses are employed car usage will fall, that does not need to be demonstrated. The issue is whether usage would fall. It is not sufficient to simply assert that other modes exist

The third bullet point refers to redevelopment being acceptable if spaces are being re-provided. This ignores the potential impact of the spaces not being available for a considerable period of time whilst redevelopment takes place. Once motorists change their shopping habits it may be very difficult to entice them back.

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This policy should be far more cautious re the potential damage to the commercial viability of town centres. We have no difficulty with redevelopment if it can be demonstrated that parking is surplus to requirements, but the elements in the policy regarding alternative means of transport and re-provision after development should be removed. They should be replaced with something along the lines of "For parking currently in use any consideration of permanent or temporary removal to facilitate redevelopment of the site should be subject to an analysis of the potential impact on the well-being of any nearby commercial activity."

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We are concerned that weaknesses in this policy as drafted constitute a threat to the viability of our town centres. In a discussion we could expand on the reasons why the impact is likely to be disastrous and why the policy should be modified. Wider considerations are the shift to the evening economy and the need for electric charging points.



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Policy \_HOU2\_ Paragraph \_page93\_ Figure/Table

\_\_\_\_\_

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

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The reality of recent years is that one and two bedroom flats have dominated the supply of new homes, as indicated in para 5.5.5. Many schemes currently in the pipeline are continuing to offer a preponderance of small flats. Hardly any houses are being built. The failure to provide larger family units, and indeed to stop the continuing loss of existing ones (see HOU03) is a major policy failure that threatens the status of the Borough as a highly desirable place for families to live. Middle and upper income families who aspire to family houses may find such housing in the Borough increasingly less affordable, and as the character of areas change they may find them less congenial places to live. It is these residents who provide the glue in the Borough supporting civic and voluntary activities, and weakening their numbers will weaken the social fabric of the Borough.

This policy does indeed express the aspiration to provide more larger family homes 9, but lacks any measures to make this happen. This policy needs much more muscle.



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It should be a requirement that sizable developments should offer larger family homes (minimum of three bedrooms suitable for 5 persons or more) and if they fail to do so then planning consent will be refused.

Stronger controls on height (see comments onCHD04) could shift the balance between the commercial appeal of building flats and instead make the provision of houses more attractive..

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The provision of sufficient family homes, including ones acceptable to middle and upper income families, is essential to sustain the social fabric of the Borough and we wish to ensure the Plan identifies means of achieving this.

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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 \_\_page 95\_\_\_\_\_ Figure/Table \_table 9  
p166, table 11 p133\_\_\_\_\_

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 checked="" 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 checked="" 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.*

Text at 5.6 identifies the concern at the loss of larger family sized homes to conversion or demolition to make way for small flats. The plan asserts that a two bedroom flat can be regarded as a family home for four persons, and as many of these are being built, the evident concern is about family homes suitable for five persons or more.

The existing policy DM01 has had some success in resisting these conversions but lacks precision and interpretation has been inconsistent. To reflect the concerns something stronger and more precise is needed. HOU03 attempts to do this and we do recognise the value of the constraints introduced by clauses (a)(d) (e) (f) and (g). But clause (b) will not only fail in its objective, it could make it easier for developers to secure approval for conversions by proposing that a gross internal area of 74sqm is an adequate minimum. Table 9 identifies that 74sqm is only suitable for a four person home, irrespective of whether two or three bedrooms. And as the availability of four person homes is not a problem specifying 74sqm is incorrect.

Para 5.6.4 says these conversions should have access to a rear garden. But table 11 specifies that for a five person flat the minimum outdoor space should be 7m<sup>2</sup>, which cannot be regarded as a garden space.

Clause (c) needs a more precise definition of what 130sqm refers to.

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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There is no definition of what constitutes a large family home but this does need to be clearly understood, and we suggest it should be a home suitable for 5 persons or more. To meet the objective of protecting the existing stock of these homes the minimum gross internal area should be increased from 74sqm to 86sqm as indicated in table 9.

To fulfil the objective of ensuring access to a rear garden the minimum garden space of 40sqm specified in table 11 should be used for these conversions.

Clause (c) should be clear whether the 130sqm minimum includes or excludes extensions and loft conversions. We expect this was drafted with the intention to reflect that 130sqm over two floors should be a property large enough to potentially be suitable for conversion, so it should be made clear the 130sqm refers to the property as built.

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Protecting existing family homes is a vital issue and as the current proposals are wholly inadequate we wish to ensure the policy can achieve this.

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Signature  G Massey\_for FORAB Date  8 Aug 21

## 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 \_CDH01\_ 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 checked="" 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 checked="" type="checkbox"/> | No <input type="checkbox"/>            |

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If the Planning White Paper proposals are implemented design codes will assume fundamental importance in the extent to which the community and the council can shape a proposed development. The national guidance produced so far is way short on the detail that will be required at local level. Whilst the Council states an intention to produce a design SPD there is no commitment regarding what form this might take. All we have for certain is the reference at clause (b) regarding the (inadequate) national guidance.

There is nothing in the Local Plan to indicate that Barnet intends to take a robust approach to design quality through a formal review and community consultation process as indicated in para 128 of the NPPF. Given the Mayor's recognition of the issue, and the Govt's aspiration to markedly improve design quality, the local approach needs to radically change.

Design quality is in the hands of planning officers but they are not equipped to effectively assess this. Consequently design is not a priority in the assessment of most planning applications. The London Plan requires that schemes referred to the Mayor must have undergone a design review. There is also no provision requiring community consultation at the pre-application stage. All too often 'consultation' takes place after a developer and officers have largely agreed the detail of a scheme.

**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.*

PolicyCHD01 should include:

A firm commitment to producing comprehensive design codes that reflect the particular circumstances of different areas of the Borough, and to identify in some detail the expectations for significant sites identified as likely candidates for development.

A commitment to establish a Design Review Panel of appropriately qualified individuals to review all schemes over a certain size or in sensitive locations

As indicated in D4 of the London Plan design review should be part of the public consultation process.

We also notice this policy also lacks any reference to fire safety. This features in the London Plan policy D4 and should be reflected here

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We believe the council is being very tardy in this area and we wish to press on what they are willing to commit to.

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Signature G. Massey\_for FORAB Date 8 Aug 21



## 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 \_CHD04\_\_\_\_\_ Paragraph \_page 129\_\_\_\_\_ 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 checked="" 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 checked="" 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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This policy merely reflects the current policy which applies across the Borough defining a tall building as one over seven storeys. The current policy identifies areas where tall buildings would be acceptable, and indeed these are extensive, but even so the policy has evidently failed as we have experience approval of tall building in areas not previously identified.

Many areas of the Borough are explicitly low rise, where anything over four storeys would be a significant visual incursion. But by implication a seven storey building, not being defined as 'tall', may be acceptable. 'Tall' buildings that vary from the prevailing landscape have engendered strong resistance.

The London Plan points the way by offering far more flexibility than hitherto, recognising that different heights could be appropriate for different localities taking account of the local context.

Continue on a separate sheet if necessary

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A different and more nuanced approach is needed, in particular recognising the flexibility offered by the London Plan.

All areas of the Borough should be assessed to determine the prevailing height and an upper limit set for each area. This could vary from 4 storeys to no upper limit. Most areas of the Borough are consistent in terms of prevailing height and we do not anticipate this would be a difficult exercise.

Continue on a separate sheet if necessary

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The application of the tall buildings policy has been very disappointing and is one that concerns many residents. We wish to ensure the council commits itself to something much more acceptable

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Signature     G Massey for FORAB     Date   8 Aug 21

## Barnet Draft Local Plan

### Publication Stage Representations Form

Ref:

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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?

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Policy ECC04 Section (e) \_\_\_\_\_ 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 checked="" type="checkbox"/> | No <input type="checkbox"/>            |
| b) Sound                                 | Yes <input type="checkbox"/>            | No <input checked="" type="checkbox"/> |
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This section of the Plan was based on the Parks and Open Spaces Strategy (POSS). Its scoring and weighting methodology was questioned during the public consultation (over 5 years ago) and indeed produced some odd assessments – for example Hadley Wood, perhaps one of the Borough’s most precious natural assets, was described as ‘low quality and low value’.

Following public interventions the Council has modified its stance on two ‘low quality, low value’ spaces – a proposal to install solar panels in Highland Gardens was dropped and £200.000 has been provided to restore the pavilion in Tudor park. In both case councillors and officers indicated that the POSS assessments were not helpful.

Neither the Council nor the public has confidence in the policy in its present form and should not be reflected as the basis for section (e).

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Section (e) should be re-worded along the following lines: "No green space listed in the Barnet Parks and Open Spaces Strategy should be considered for redevelopment except in exceptional circumstances (i.e. criteria i.-iii)

Continue on a separate sheet if necessary

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Any development of an open space is a very sensitive issue and we are anxious to ensure that the Local Plan recognises this with a watertight policy.

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**Barnet Draft Local Plan**

Publication Stage Representations Form

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Policy TOW01/02 \_\_\_\_\_ 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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We are fully supportive of policies TOW01/02 but the drafting does not reflect the reality of the contraction of retail recent changes to classifications (the majority of commercial properties now in Class E). The introduction of Permitted Development allowing the conversion of shops to residential use may hasten the loss of retail outlets. TWO1(b) for example is very robust on defending local parades from changes to other uses, but such losses have occurred over recent years and Permitted Development is likely to accelerate this.

These issues are mentioned in the accompanying text but are not reflected in the two policies.

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To be sound these two policies should be redrafted to reflect the reality of the decline in retail and the possibility of many outlets undergoing change of use. If the aspirations in the policies are to be sustained there needs to be reference to more robust protection such as using Article 4 Direction wherever possible.

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Policy TRC02 page 252 \_\_\_\_\_ Paragraph \_\_\_\_\_ Figure/Table \_\_\_\_\_

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

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These comments link to our comments on policy GSS09

This policy fails to disguise the paucity of improvements to transport capacity. Of the eight measures listed in (i) to (viii) five are merely improvements at interchanges and the last is meaningless. Whilst interchange improvements might be welcome they could be counter-productive if the trains and buses cannot cope with any extra traffic they generate. The only indications of improvements to capacity are the West London Orbital, which will only serve one corner of the Borough, and Crossrail 2 which is most unlikely to be delivered over the lifetime of this Plan.

Over the past 20 years the population of the Borough has increased by some 50,000 with only modest increases in train capacity on the four north-south rail routes. But between 2010 and 2017 alone the number of people entering and leaving High Barnet Station for example increased by some 50%. Rail capacity and predicted demand should be fundamental to any transport plan for the Borough but are absent from this part of the Plan. So services already stretched will have to cater for the additional traffic arising from a further 50,000 increase in the population.

Continue on a separate sheet if necessary

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The transport plan and identification of infrastructure and service improvements needed should be informed of an assessment of current and future demand and capacity to deal with that.

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.*

Rail capacity is fundamental to the functioning of the Borough and has not been dealt with in the Plan. We wish to press the council on how this deficiency will be corrected

**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 G. Massey for FORAB Date 8 Aug 21