

## Barnet Draft Local Plan

Publication Stage Representations Form

(For official use only)

Ref:

### 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 \_\_\_\_ECC01\_\_\_\_\_ 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 🗆	No x
b)	Sound	Yes □	No x
c)	Compliant with the Duty to Co-operate	Yes 🗆	No 🗆

# 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 Plan describes a biodiversity metric which purports to assess an area's value to wildlife, helps to determine the impact of local development and therefore informs planning applications. The information on which this is based includes the conditions of each habitat parcel. While this does include air and noise pollution (p. 204), it does not and MUST include light pollution which has a well-documented impact on human and environmental health. "Given the current urgent need to save energy as our planet warms, and the evidence that waste light is a contributory factor to the rapid decline in biodiversity

(www.sciencedaily.com/releases/2018/06/180619122456.htm)

, we should be urging all administrations, both local and national, to save energy and reverse biodiversity decline by tackling waste light."

(Chapter 3, https://britastro.org/dark-skies/pdfs/CfDS booklet Rev07.pdf).

Indeed the London Environment Strategy [LES] states (p. 134) : "Urbanisation can also have indirect impacts such, as: ... noise and light pollution affecting the ability of wildlife to breed or feed successfully; and exacerbating changes to the urban climate caused by climate change."

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.

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These measures are all easy to adopt and will offer immediate and better protection of the bioenvironment and health.

#### 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.

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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) but	х
I am seeking modification to the Plan	

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Signature	Date	e8 <sup>th</sup> Aug 2021_	
	Dutc	o My 2022	



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Publication Stage Representations Form

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Policy \_\_\_\_ECC02\_\_\_\_\_ 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 🗆	No x
b)	Sound	Yes □	No x
c)	Compliant with the Duty to Co-operate	Yes 🗆	No 🗆

# 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 Plan describes a biodiversity metric which purports to assess an area's value to wildlife, helps to determine the impact of local development and therefore informs planning applications. The information on which this is based includes the conditions of each habitat parcel. While this does include air and noise pollution (p. 204), it does not and MUST include light pollution which has a well-documented impact on human and environmental health. "Given the current urgent need to save energy as our planet warms, and the evidence that waste light is a contributory factor to the rapid decline in biodiversity

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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)	
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Signature	/ Da	ate	8 <sup>th</sup> Aug 2021



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Policy \_\_\_\_ECC06\_\_\_\_\_ Paragraph \_\_\_\_\_ Figure/Table \_\_\_\_\_

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

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