



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 CDH01 Paragraph 6.4.2 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.

Whilst the overall intent of the policy and the supporting paragraphs are both supported, it is considered that these can be better worded in order to ensure full consistency on national policy in regard to optimising sites for residential development and ensuring well-designed places. Specifically, this relates to parts 11 and 12 of the National Planning Policy Framework (2021).

The NPPF is clear that Local Plan policies should '*optimise the use of land in their area and meet as much of the identified need for housing as possible*' (paragraph 125). Similarly, with reference to achieving well designed places it is noted at paragraph 130 that '*Planning policies and decisions should ensure that developments...optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development*'.

The limitations on land supply and availability within the borough are clearly highlighted through the proposed Plan. This includes the level of land falling within Green Belt and Metropolitan Open Land designations and the drive to protect and enhance heritage, environmental and social assets wherever possible.

This means that the use of available land must be as efficient as possible, particularly in order to deliver more than 5,000 homes (almost 15% of the overall minimum housing target over the life of the Plan) from non-designated sites as set out by Policy GSS01.

Continue on a separate sheet if necessary

Current and previous Local Plan policies have specifically stated that the loss of houses from roads traditionally characterised by houses will not normally be appropriate (for example, Development Management Policy DM01). Such policy has limited the potential to optimise the residential use of previously developed land through alternative forms of development that could offer an increased residential density compared to houses.

The revised approach proposed within the new Local Plan policies remove this limitation which is welcomed and Policy CDH01 is clear that design-led residential development should deliver the optimum density from any development site. However, the policy and supporting paragraphs as currently drafted are not clear that such optimisation could include alternative forms of housing provision (for example, flats or apartments) in locations previously characterised by houses.

Given the wording of current and historic policies, it is important that the potential to deliver different forms of residential development from any site is as clear as possible within the new Local Plan. This shift in policy emphasis needs to be specifically stated so that any residential development proposal can be assessed in terms of optimisation through overall design and character and not simply whether the specific form of housing is unchanged from previously.

This can be achieved through some minor changes to Policy CDH01 and supporting paragraphs as set out below. By removing any potential ambiguity on this matter, this will ensure soundness through full consistency with national policy as set out above and also support the overall intent to optimise residential development capacity from all sites.

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 address the matter noted in Question 3 above, the following related modifications are proposed.

Paragraph 6.4.2 (additional text underlined)

The Council will not approve designs for new development that is inappropriate to the local context or does not take opportunities to enhance the character and quality of an area. High quality design solutions help to make new places that can make a positive contribution to the existing suburban character. The form of new residential development may differ from that traditionally prevalent in a location (for example, provision of flatted units in place of houses) where this will optimise housing delivery from a site. Detailed assessment of the impacts of development proposals will be based on a set of criteria that seek to ensure that the local character and existing context are reflected, to deliver high quality design, accessible buildings and connected spaces that are fit for purpose and meet the needs of local residents. Such criteria will be set out in the Sustainable Design Guidance SPD following adoption of the Local Plan

Continue on a separate sheet if necessary

Policy CDH01 Promoting High Quality Design (additional text underlined)

a) In order to make the most efficient use of land residential proposals must be developed at an optimum density. A design-led approach to determine capacity should deliver an optimum density. Achieving such an optimum density may include alternative forms of residential development to those traditionally found in a location, for example the provision of flatted development in place of houses. This approach should consider local context, accessibility by walking and cycling and existing and planned public transport as well as the capacity of infrastructure...(remainder of policy unchanged)

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.

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.

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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 __Savills, on behalf of Harrison Varma Ltd____ **Date**__06/08/2021_____