



**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: **5c** Figure/Table N/A

Policies Map designation: N/A

**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 checked="" type="checkbox"/> | No <input type="checkbox"/> |
| c) Compliant with the Duty to Co-operate | Yes <input type="checkbox"/>            | No <input type="checkbox"/> |

**Draft Policy GSS01 – Delivering Sustainable Growth – Paragraph 5c**

Acknowledging the National Planning Policy Framework ('NPPF; 2021) Paragraph 105 which states that '*significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel*', our client considers that the strategy included under Draft Policy GGS01 is sound. This includes '*further intensification around Hendon Station*' in delivering sustainable development, which also supports policy objectives of the London Plan (2021) (Policy GG2 'Making the best use of land') which local plans in Greater London are required to be in general conformity with. On this basis, our client wishes to highlight the suitability of previously developed land adjacent to Hendon station (known as the Hendon Goods Yard) for high-density housing – which would actively support this policy objective and the NPPF Paragraph 120 which states that '*planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes...alongside supporting the development of under-utilised land, especially if it would meet an identified need where land supply is constrained*'. The site's connectivity is also set to further increase through the introduction of the West London Orbital (WLO) and Crossrail 2, further supporting transformation in the Hendon area and the delivery of sustainable growth.

**Draft Policy GSS09 – Existing and Major New Transport Infrastructure – Paragraph 5 and Supporting Text 4.24.5**

As per our client's response to Draft Policy GSS02, our client considers that Draft Policy GSS09 is sound and supports the Draft Policy objective for '*significant intensification and growth at Hendon station*' including the delivery of residential as the priority use (supporting text 4.24.5). This actively supports the NPPF Paragraph 119 and London Plan Policy GG2 ('Making effective use of land') and is therefore be considered sound on this basis.

**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.**

### **Draft Policy HOU02 – Housing Mix – Criteria C-F**

Our client considers that Draft Policy HOU02 is sound – subject to including criteria under Paragraphs C-F which recognise that in assessing housing mix, the Council will take account of context, PTAL, mix of uses and range of tenures. Innovative housing products will also be supported. This approach ensures that the right homes are delivered at the right place in the Borough, taking account of site-specific context, and is therefore considered to accord with the NPPF Paragraph 68 ('Identifying land for homes').

### **Draft Policy CDH01 – Promoting High Quality Design – Paragraph A**

Our client supports the overarching objective of Draft Policy CDH01 (paragraph a) which states that residential proposals should make the most efficient use of the land by optimising density – through a design-led approach. This is in line with the NPPF (Paragraph 125) and the London Plan (2021) Policy D3 ('Optimising site capacity through the design-led approach') which states that *'all developments must make the best use of land by following a design-led approach that optimises the capacity of sites'*. It is therefore considered that Draft Policy CDH01 is sound on this basis.

### **Draft Policy CDH04 – Tall Buildings – Paragraph A**

Draft Policy CDH04 sets out the preferred, strategic locations and Growth Areas for tall buildings in the Borough, in accordance with the London Plan 2021 (Policy D9) – which is considered a sound approach. However, our client considers that the Existing Transport Infrastructure of Hendon Station should be included under this policy, to be in line with optimisation objectives of Draft Policy GSS09 and in the interests of ensuring the delivery of sustainable growth at key transport nodes, in line with Draft Policy GSS01. Further, as connectivity is planned to be further increased at Hendon station by way of Crossrail 2 and the WLO, it is considered that opportunities for tall buildings at underutilised land adjacent to the station should be explicitly recognised. Indeed, this is acknowledged under supporting text 6.18.3 which states that due consideration should be given to existing and planned supporting infrastructure when assessing tall building locations, with proposals occurring in the most suitable and sustainable locations. We would therefore request that Draft Policy CDH04 is reviewed by the Council to ensure it compliments Draft Policies GSS01 and GSS09 before it is submitted for Examination.

### **Draft Policy TRC02 – Transport Infrastructure – Paragraph A(iv)**

Our client supports the inclusion of upgrades to Hendon Station under Draft Policy TRC02 (paragraph A(iv) – in seeking to help facilitate growth, as set out under Draft Policy GSS09 (i.e., intensification of housing at Hendon Station). This is in line with the strategic objectives of the NPPF Paragraph 104 and is considered sound on this basis.

*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.*

**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.*

Please see response under Draft Policy CDH04.

**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

**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.

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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**



**Date 09.08.21**