



**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 BSS01 \_\_\_\_\_ Paragraph 3.3.1 area \_\_\_\_\_ 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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National/London-wide/Barnet housing need projections are all based on estimates done before Brexit and COVID-19. Evidence such as the PWC estimate of a 300,000 reduction in London population in 2021 (<https://www.theguardian.com/uk-news/2021/jan/07/london-population-decline-first-time-since-1988-report-covid-home-working>) suggests that future objectively-assessed housing need will be far less than is currently estimated. The Local Plan needs to recognise this and provide a mechanism for revising housing need without a complete re-publication of the Plan. Otherwise, unnecessary and unwanted homes will blight the borough.

**Continue on a separate sheet if necessary**

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Text along the lines of:

“It is recognised that the impacts of Brexit and COVID-19 on housing need, although currently unquantified, will be significant. The Authorities Monitoring Report (AMR) provides continuing review and monitoring of the Council’s housing targets and its performance against them. The AMR will reflect changes to needs as they emerge from national and local studies, and will result in appropriate amendments to housing targets in the appropriate documents such as the Growth Strategy Delivery Plan.”

The impact of future changes in housing need should be reflected elsewhere in the plan where definitive numbers are given which may need to change – chiefly section 5 and the various specific growth area policies – by reference to the overarching strategic policy BSS01.

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Policy HOU02\_\_\_\_\_ Paragraph \_\_\_\_\_ Figure/Table \_\_\_\_\_

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

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- |  |   |  |
|--|---|--|
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To clarify the objectively assessed need that 1 bedroom homes are the least desirable, and give the council the ammunition they need to refuse developments with excessive 1 bedroom units, this should be explicit in the policy wording of HOU02.

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After the current b):

“c) 1 bedroom homes are the lowest priority in market and affordable homes. Their inclusion, particularly in larger developments, should be in proportion to the identified need unless compelling justification can be supplied. If large developments do not deliver an appropriate mix of unit sizes reflecting the Borough’s identified need then planning applications will be refused.”

Reindex the current c) and all references to it to d)

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Policy CDH04 \_\_\_\_\_ Paragraph \_\_\_\_\_ Figure/Table \_\_\_\_\_

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

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Tall buildings policy contains a number of errors that could lead to misinterpretation. See text below.

More generally, it would be better to define tall (and very tall) buildings in relation to their immediate surroundings, to be more sensitive to the local character of an area.

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c) reference to part d) should be to part e)

d) should say “produce [an] SPD...”

e) should say “Proposals for Tall and Very [Tall] Buildings...”

Consistent title case for Tall and Very Tall Buildings would be clearer, to emphasise that they are defined terms.

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Policy \_\_\_\_\_ Paragraph 6.4.2/6.5.2 \_\_\_\_\_ Figure/Table \_\_\_\_\_

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

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Consistency with national policy is not clear. The document that Barnet will use to specify design codes is incorrectly identified, and the current text of 6.5.2 implies that there will only be one design code for all Small Sites, when there should be provision for plot-specific design codes, as in the National Model Design Code.

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References to ‘the Sustainable Design Guidance SPD’ should be to ‘the Sustainable Design and Construction (SD&G) SPD’ – that is the full title.

At 6.5.2 “Through the use of a specific Design Code for Small Sites” should be “Through the use of specific Design Codes for Small Sites” to emphasise that different small sites may have different design codes, in line with national policy.

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Policy \_\_\_\_\_ Paragraph Annex 1 site 56 \_\_\_\_\_ Figure/Table 4 – list of sites \_\_\_\_\_

Policies Map designation 5 Borough Sites Map \_\_\_\_\_

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Site 56 – Woodside Park Station West - is inappropriate and undeliverable. To accommodate 356 units on this thin strip of land in a suburban residential neighbourhood would require an excessive Very Tall building completely out of character with the surrounding area, overloading local amenities and overshadowing existing properties. In addition, work has started on part of the land to build 86 affordable flats ('pocket homes') under 19/4293/FUL, so it is unavailable for the massively more intense development required.

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Remove site 56 (and renumber accordingly), or replace with details of the approved development as per 19/4293/FUL.

Adjust all related figures accordingly.

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