



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 **See attached letter 6th August 2021** 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 type="checkbox"/> | No <input checked="" 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.

Clause 2.8 Transport: Appropriate assessments need to be undertaken to ensure parking standards are reflective of the impact that parking is having on areas such as Mill Hill/Mill Hill East, as opposed to a blanket policy advocated within the London Plan. (see accompanying letter)

Clause 4.24.5 Within Mill Hill/Mill Hill East there is a demand for parking at the stations. The wording of the Plan is contradictory and the policy GSS09 should be expanded to require all applications to be supported by an assessment of car use and a PERS audit to maximise the efficiency of the surrounding pedestrian environment. (see accompanying letter)

Clause 4.28.4 The enhancement of footpaths, cycling and bridleway networks need to include for the omission of faster electric cycles and scooters as a matter of public safety. (see accompanying letter)

Site 29: Landscape planting needs to be included along the motorway to screen the site. (see accompanying letter)

Site 46: This site was included in the Millbrook Park land use strategy as 'employment' and it should be retained as such. (see accompanying letter)

Site 49: This proposal infers loss of Green Belt: the site boundary does not comply with NPPF: the inclusion of this site in the Plan as it stands is not sound: the resulting density of development will not take into account the impact on the heritage assets. (see accompanying letter)

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.

Clause 2.8: include for assessments to ensure local parking needs are met rather than applying a blanket policy advocated in the London Plan.

Clause 4.24.5: Policy should be expanded to require assessment of car use and PERS audit.

Clause 4.28.4: Redraft to include the exclusion of electric cycles and scooters on grounds of health and safety.

Site 29: Include for screen planting alongside the motorway to limit views into the waste management site.

Site 46: Retain this site for employment in line with 'the fifteen-minute neighbourhood'.

Site 49: The 80% retained as Green Belt should be excluded from the allocation boundary. Policy CDH08 needs to be included: The NPPF in respect of Green Belt boundaries needs clarification and as they stand they fail to accord with NPPF else the special circumstances associated with Green Belt release have not been met and the allocation of this site is not sound.

See our accompanying letter dated 6th August 2021 for further detail.

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) yes

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.

MHPS wish to ensure that matters of local concern are raised with the inspector and in order to do this personal representation is considered necessary.

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.

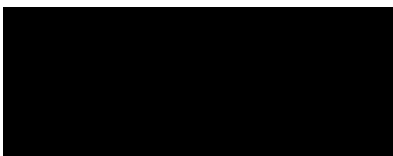
Your details will be kept in accordance with the Council's Privacy Notice, until the Local Plan is adopted plus a further five years to evidence that a fair and transparent process has been followed. Processing is kept to a minimum and data will only be processed in accordance with the law. We will take 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



Date

6th August 2021

Mill Hill Preservation Society founded 1949

Patron: Lady Hobson OBE JP
President: Dr Michael Worms BSc PhD
Hon. Architect: John Living AAdip CMDip RIBA
Hon. Solicitor: Robert Cottingham MA
Hon. Treasurer: Wendy Living BA ACA JP
Administrator & Membership Secretary: Kim Thompson



...making change worthwhile

For the attention of Nick Lynch – Planning Policy Manager

London Borough of Barnet
7th Floor
2 Bristol Avenue
Colindale
NW9 4EW

6th August 2021

Sent only by email to Nick Lynch and forward.planning@barnet.gov.uk

Dear Mr Lynch

Consultation Response from the Mill Hill Preservation Society

Barnet Council's Draft Local Plan (Reg 19) June 2021 Plan Period 2021 to 2036

Mill Hill Preservation Society is a civic society with more than 800 members and a large following of supporters on Facebook. Our remit is to consider the postcode area of NW7 and our reading of the proposed Local Plan is in part limited to this area.

Introduction:

We have compared the latest Draft Local Plan Reg.19 with the original comments we made in our response 5th March 2020 against V.18 of the plan. Where the point raised in the original letter is considered to be of no further relevance it has been omitted in this document.

It is understood that in responding to a Reg. 19 Draft Local Plan it is a requirement to ascertain whether the Plan is 'Sound', and in order to be considered as sound the Plan must be positively prepared, justified, effective and consistent with national planning policy.

At this time, the Society considers that the Plan cannot be sound, but that changes can be made to enable it to be made sound.

Chapter 2: Challenges and Opportunities:

Clause 2.8 Transport

2.8.4 The Plan accepts that the car is the dominant mode of transport in outer London, and Barnet has long been associated with a high level of car ownership. Within the lifetime of the Plan, realistically, there will be little change in this reality. Whilst the Local Plan needs to support active travel and public transport opportunities it also needs to provide for adequate parking standards to meet the requirements of residents - 70% of whom live in residences with motor vehicles.

Recent developments within the area have exacerbated on-street parking within the Conservation Area to the extent that it is undermining the character and appearance of the area and directly impacting on the safe and free flow of traffic. Due to the strategic nature of the Transport Assessment this consequential impact is not considered.

The Mill Hill Conservation Area Appraisal 2008 noted the impact that development and traffic was having on the value of the heritage asset. Since this appraisal was undertaken, this situation has only been exacerbated.

Appropriate assessments should be undertaken to ensure parking standards are reflective of the impact that parking is having on areas such as Mill Hill/Mill Hill East, as opposed to a blanket policy as advocated within the London Plan.

Policy GSS09: Existing and Major New Transport Infrastructure

Clause 4.24.5 The clause outlines the use of station car parks for development and MHPS were concerned about the loss of car parking spaces for commuters. We note the plan now includes the sentence "Existing provision must be assessed and replacement car parking may be supported through a more land-efficient design approach such as multi-story design".

This sentence and the preceding sentence are somewhat contradictory and it is necessary to ensure any developer understands exactly what is expected of them. Within the Mill Hill/Mill Hill East area, there is a demand for car parking at the stations, as many people do not rely on 'non-car' modes of transport to reach the stations before continuing their journey on public transport. The policy should be expanded to require all applications to be supported by an assessment of car use and a PERS* Audit to maximise the efficiency of the surrounding pedestrian environment. (*PERS – Pedestrian Environment Review)

4.28 Strategic Parks & Recreation Policy GSS13 (and related Policy ECC04 Barnet's Parks and Open Spaces)

Clause 4.28.4 The All London Green Grid Strategy: The Society has noticed a considerable number of references to 'enhancement of footpath, cycling and bridleway networks' and here is as good a place as any to comment on this aspect. We trust that due consideration will be given to safety issues where routes are shared with often elderly walkers, children and potentially less able people.

This is important, as there is an increasing range of faster electric cycles and scooters that could be used on these improved routes and we would not wish to promote anything that might lead to an increase in accidents. We note the plan does emphasise the development of the Green Grid for "walking and cycling".

Section 5: Housing:

Policy HOU02 Housing Mix: MHPS supports policy HOU02 and the priority attached to the provision of 3-bedroom units. We also support Policy HOU03 'Residential Conversions and Re-development of Larger Homes' that seeks to protect the character and amenity of local areas and seeks to protect larger existing homes subject to conversion.

Site 29: Scratchwood Quarry NW7 3JA – Waste Management: This site has the potential for increased use, which is not disputed. However, this is an important location as it is on one of the main approaches to London viewed from the M1 and is highly visible. There is a clear need to improve the visual aesthetics of the site and reduce any additional air pollution with appropriate screen planting along the motorway. To ensure the effectiveness of the policy, it should be updated to include a requirement for screen planting along the motorway boundary.

We suggested that previously but this has been ignored in the latest version of the Local Plan. MHPS believe this position should be reconsidered.

Site 46: IBSA House The Ridgeway NW7 1RN – This site was showing as Residential with 20% B1 uses in Reg.18 Plan and is now showing as residential only and the employment use (formerly B1 use) has been dropped.

The site was used as part of the evidence base for the adjacent Millbrook Park development. As part of that application this site was used as justification for the development mix on this adjacent site, with all employment provision being provided on the IBSA House site. There has been no evidence provided to demonstrate why this employment use is no longer required, particularly when paragraph 4.5.1 of the draft Plan indicates that an additional 27,000 jobs are now required to support the housing growth within this Plan period.

The loss of the employment uses in favour of increased residential provision is not deemed sustainable and only serves to actively encourage movements out the area, contrary to ‘the fifteen-minute neighbourhood’ as set out in the Local Plan – for example see paragraph 2.1.4.

Site 49: Watchtower House & Kingdom Hall, The Ridgeway NW7 1RS/1RL – We are concerned about this proposal as it seems to infer a loss of Green Belt, something the Society strongly opposes. Due to its location in the Green Belt and the Conservation Area we agree with the stated ‘Site requirements and development guidelines’.

In addition, we are clear that the field below the Kingdom Hall, and to the west of the public footpath, should be retained untouched.

Furthermore, we do not understand why the original development potential was stated at 219 units which has now been increased to 224 in this version of the Local Plan.

As stated above this site is located within both the Green Belt and Conservation Area. It is appreciated that part of the site is classed as previously developed land, however, the proposal allocation covers *more than double* the area of developed land and will remove a significant green pocket from the within the Conservation Area. Again, the Society strongly opposes this.

It is noted that the policy seeks to retain 80% of the site as under-developed Green Belt; on this basis, this 80% should be excluded from the allocation boundary. Furthermore, the ever-increasing housing density, based on the development areas set out in the policy will equate

to a density of 191.5dph on the development parcel. The impact on protected trees will be extensive and this scale of development will be out of keeping with the character and appearance of the Conservation Area. The policy doesn't, and clearly should, reference policy CDH08: Barnet's Heritage.

Paragraph 143 of the NPPF advises that Green Belt boundaries should not include land which it is unnecessary to keep permanently open. It is for this reason that the land identified to be retained as open land on this site, should be retained within the Green Belt.

The lack of consideration of the site's constraints and impact on heritage assets fails to demonstrate that this site, at this scale is deliverable, thus resulting in the policy being unsound. Moreover, the Council accept that 80% of the site should be retained as Green Belt but propose to allocate the entire site. This is contradictory in itself, fails to accord with the NPPF and needs to be rectified, otherwise the special circumstances associated with Green Belt release have not been met and the allocation of this site is not sound.

Summary

There are considerable concerns regarding the efficacy of the above elements of the Plan and therefore its overall soundness.

There is a lack of consistency within the Plan as to whether it is a Mill Hill Growth Area or Mill Hill East Growth Area. However, either approach has a direct impact on Mill Hill as a designated Conservation Area, with developments over recent years highlighting this point.

The Plan lacks any meaningful consideration of the ongoing impacts of development on what is left of the Conservation Area character and does not therefore adequately demonstrate that this Growth Area is achievable without detrimental effects on the Conservation Area.

This completes our comments on the Draft Local Plan V.19 and we look forward to taking part in future hearing sessions as the Plan evolves.

Yours sincerely,

John Living

John Living Honorary Architect
On behalf of Mill Hill Preservation Society - Planning Group