



**Barnet Draft Local Plan**  
Publication Stage Representations Form

Ref:    (For official use only)
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**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 \_\_\_\_\_ 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 checked="" 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.**

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The basic premise of policy GSS01 is that it is 'Sustainable'. However, the number of homes detailed in the policy amounts to 45,700 which suggests a population increase of close to 90,000 based on the requirement of at least two incomes to be able to afford the new homes being built (other than social housing). With the requirement for 90,000 income generators, one would expect a similar number of new jobs to be created in order to make the developments 'sustainable'. While the Brent Cross growth area is identified as generating 27,000 jobs, there remains a high degree of uncertainty in the post covid world that demand for the volume of planned new office and retail space will be sufficient to meet this employment target. Even if that target is met it means that there will be a significant shortfall between the jobs created and the number of new income generating residents to the borough which will increase the levels of commuting outside the borough. This will have a significant environmental impact, either by increasing road usage (car and bus) or additional pressure on underground and rail networks. The Employment Land Review identifies the pressure on employment land and how this is being eroded in favour of housing development yet there are very few measures to protect employment land from housing development and Policy ECY01 allows this to take place so long as a financial contribution is made. Given residential values will always exceed employment land values the reduction in employment land will only continue unless strong policies are in place. The London Plan makes the distinction of "Good Growth" recognising the importance of affordable workspace, and culture and leisure facilities as part of the growth strategy which should be socially and economically inclusive and environmentally sustainable. This should be replicated in the Local Plan.

**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.**

As a policy principle, the local plan should ensure that the number of new homes is matched by job creation within the borough and that there should be proactive policies to attract new employers into the borough. Sites such as the North London Business Park could have been developed as technology hubs attracting in technology and supporting industries with high value employment. Instead they will provide homes for commuters who will place much greater pressure on the transport infrastructure. GSS01 must include a clear balance between housing and employment land and ensure that job creation is included as a key component of sustainable growth.

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The local plan is overly focussed on new homes without any advocacy for jobs growth. Developers, who are particularly well resourced, have dominated the dialogue, yet no effort has been made to understand the need for well paid local jobs. Someone needs to be speaking up for employment as a key component of sustainable growth and that is why I would like to participate.

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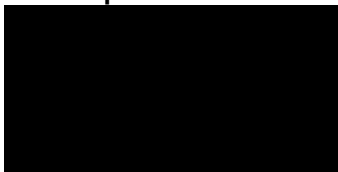
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NBCA \_\_\_\_\_

Date 6 August 2021



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**Question 1: To which part of the Local Plan does your representation relate?**

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Policy \_\_\_\_ GSS08 \_\_\_\_ Paragraph \_\_\_\_\_ Figure/Table \_\_\_\_\_

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

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<p>New Barnet is constantly referred to as a District Town Centre. While it does have a supermarket greater than 500m<sup>2</sup> and a gym in a converted office building it has few other shops and does not provide destination shopping other than for the supermarket. As a resident of New Barnet I am forced to travel to either Chipping Barnet or North Finchley to shop for anything other than food. We have no bank, clothes shopping, electrical or hardware. New Barnet consists predominantly of fast food shops and cafes, hairdressers, a sub post office and newsagent, two public houses betting shop and dry cleaners. The intention of the policy appears to relate only to the main town centres and these are specifically listed. However, Policy GSS08 uses the all encompassing title of "Barnet District Town Centres" but then refers to "Main Town Centres". The ambiguity between "District" and "Main" town centres may therefore lead to a lack of clarity when making planning decisions, allowing developers to interpret where major housing development can take place.</p>
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I would ask that this policy heading is revised to state “Barnet’s **Main** Town Centres” and that all other references in the document are changed from ‘District’ to ‘Main’ town centres. This will provide much greater clarity on this policy and eliminate the ambiguity between Main and District Town Centres.

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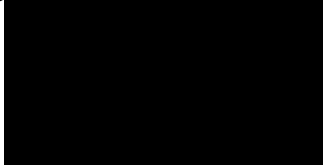
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NBCA \_\_\_\_\_

Date 6 August 2021 \_\_\_\_\_



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Policy \_\_\_\_ GSS11 \_\_\_\_ Paragraph \_4.26.1\_\_\_\_\_ Figure/Table \_\_\_\_\_

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

**Question 2: Do you consider that this part of the Local Plan is:**

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- |  |                              |  |
|--|------------------------------|--|
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Paragraph 4.26.1 refers to Major thoroughfares within the borough and includes, on the list, the A110, East Barnet Road. While this may be an A Class Road, it cannot be described as a major thoroughfare as the road is constrained by the railway bridge at the north end which restricts movements and is height limited.

This stretch of road was not recognised by TFL in 2011 as one of the 1,703 major road links within Greater London with an annual average daily flow estimate of greater than 10,000 vehicles. There are many other stretches of road within Barnet which sit within this list yet are not listed as major thoroughfares, including A502 Brent Street, and the A5109 Totteridge Lane. While the A110 Cat Hill is listed with traffic counts of approximately 16,000 vehicles per day, this is at a point where it picks up traffic coming from the A1000, down Longmore Avenue and through East Barnet Village as well as traffic coming up from the south along Church Hill Road. The count point at Cat Hill does not reflect the volume of traffic on East Barnet Road as evidenced by traffic counts taken at the junction of East Barnet Road and Margaret Road which indicated a figure below 10,000 vehicles per day.

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We would assert that the designation of this specific stretch of the A110 East Barnet Road as a Major Thoroughfare is both irrational and without evidence and would ask that East Barnet Road is removed from paragraph 4.26.1.

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\_\_\_\_NBCA\_\_\_\_\_

Date \_\_\_6 August 2021\_\_\_\_\_



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

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

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- |  |                              |  |
|--|------------------------------|--|
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<p>While the policy recognises the need for family housing it is unenforceable and as such meaningless. Developers are reluctant to build three bedroom homes as they believe they are less profitable than studio and one bed flats and will typically only be included as part of the social housing requirement. The impact of this will force families to move out of Barnet due to the lack of supply of family homes. This also fails to recognise that due to the unaffordability of housing, children are living much longer in the parental home including adult children (over 18), and that in these circumstances they will be forced to share rooms even if they are of different genders.</p> <p>The Annual Monitoring Report identified that between 2011/12 and 2019/20 15,984 homes were completed of which 78% were studio, one and two bed homes. However, The Strategic Housing Market Assessment in November 2018, recognised that there was still a shortage of 3 bed properties and that these should be the top priority for open market housing. It states at 4.23 that "The percentage of overcrowded households in the private rented sector has also had the biggest increase from 25.1% to 35.7%". As this was based on the last census in 2011 the situation is likely to have worsened when the 2021 census figures are disclosed. Unless the Local Plan clarifies and strengthens the policy on housing mix the problem of overcrowding will only get much worse.</p>
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The policy should include specific requirements for developments of more than 150 homes to provide the mix of homes detailed in the policy and supported by the Strategic Housing Market Assessment and that these requirements cannot be offset with financial payments. The policy must be explicit that failure to provide the mix of homes will result in an automatic planning refusal.

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The local plan is overly focussed on the number of new homes without any clear focus on the appropriateness of the mix of housing, particularly the number of bedrooms. No one seems to be advocating for family housing simply allowing developers to build what they want and that is why I wish to participate.

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<p>The Employment Land Review identifies the pressure on employment land and how this is being eroded in favour of housing development. However, there are very few measures to protect employment land from housing development and Policy ECY01 allows this to take place so long as a financial contribution is made. Given residential values will always exceed employment land values, the reduction in employment land will only continue unless strong policies are in place. The Employment Land Review identified the importance of sites like North London Business Park yet this site has an extant consent for housing. The Policy appears passive in that it will support applications brought forward in Locally Significant Industrial Sites (LSIS) but it fails to actively promote these sites or encourage employers to relocate to Barnet. It also tacitly precludes employment opportunities being brought forward in non LSIS.</p> <p>There is no designation of Tech Hubs or Research &amp; Development sites which have the potential to bring skilled, well paid employment to Barnet and as such will mean that job creation is limited to office and retail employment, both of which have suffered during the covid pandemic. The policy fails to provide a vision of what Barnet could be achieving in comparison to cities like Coventry, Bradford or Nottingham all of which have smaller populations than Barnet.</p>
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The local plan should take a more positive approach to job creation by setting a goal of proactively attracting new employers into the borough. Sites for technology, medical research, pharma or other skilled employment should be identified and designated, coupled with resources such as a business development unit to attract in employers to Barnet. The target for the number of jobs to be created should be linked to the number of new homes built so that additional new homes can only be built if there is a corresponding number of jobs created. This would help to reinforce the link between housing and employment, something which will be essential for a sustainable society.

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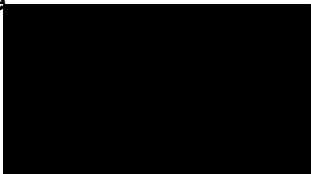
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