



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 Annex 1 – Schedule of Site Proposals

Figure/Table Site No. 8 Broadway Retail Park (Cricklewood Growth Area) , Site No 7 Beacon Bingo (Cricklewood Growth Area)

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.

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.

Regarding the inclusion in Annex 1 – Schedule of Site Proposals of Broadway Retail Park with an indicative capacity of 1007 units and Beacon Bingo with an indicative capacity of 132 units.

The council did not involve the community on this aspect of the plan or present this aspect as part of the Engage Barnet process. The only effective consultation has been the consultation on a planning application to build 1050 residential units on this site (the plan calls for 1007) to which there have been over 2000 objections.

The council has not co-operated with neighbouring boroughs to form any sort of masterplan for Cricklewood, in the town centre of which this site is, despite half Cricklewood and its town centre falling in neighbouring Brent and around a quarter in Camden. Intensive development of these sites would have a major effect on the entire town centre and Cricklewood as a whole.

No basis for the Indicative Residential Capacity of 1007 residential units on 2.77 hectares is provided. At 363 units/hectare, this would only be in the maximum density range for a Central setting. Cricklewood is not an area with very dense development, large building footprints and typically buildings of 4 to 6 storeys within walking distance of a Metropolitan or Major Town centre; it fits the description of an urban setting of terraced houses and mansion blocks, medium footprints two to four storeys (in fact, two to three), with a small town centre and along an arterial route that in London hardly counts as main.

....continues

The same applies to the indicative capacity of 132 units on the 0.47 ha Beacon Bingo site.

The draft plan says planning application 20/3564 for 1100 units has been refused. This is not true; it has not yet been considered by the planning committee. It has been reduced to 1050. The 2000+ objections to the application, including from within Barnet Council (“gargantuan”, “vast disparity and inappropriateness of scale, height and massing”, impact on conservation area, and more), rehearse the many ways in which such high density is inappropriate for the setting and should be undeliverable per the borough’s own general and particular policies including those summarised and reviewed in the Tall Buildings Update 2019.

Ideally, planning application 20/3564 will indeed be refused and any future application will soundly comply with this local plan’s policies for urban setting, the tall buildings and other policies, and the duty of co-operation. If however this indicative capacity remains in the Local Plan, it may be used as a justification for future applications or even, if matters drag on, for application 20/3564, and so it is important that it be rectified at this stage and not left as a threat hanging over Cricklewood.

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.

The indicative capacity of the sites should be reduced to mid-range for the urban setting.
Necessary adjustments should be made to any other parts of the plan dependent on these values or which have led to the use of the current excessive values.

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

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.

We have not engaged with the formation of a Barnet Local Plan at this level before and do not know what the inspector will find most relevant or wish to explore most. We will be best able to assist by participating.

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 [http://www.barnet.gov.uk/privacy-notice](#)

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 9 Aug 2021