



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 _____ CHW02 _____ Paragraph _____ 8.17.2 _____ 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 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.

8.17.2 Health and Wellbeing Strategy “seeks to utilise the capacity and resilience of public health systems”... to “make a positive difference to health and wellbeing in the Borough” (p183).

Mitigating the impacts of air pollutants as set out in ECC02 is mentioned, but there should be clearer statements of how this can be achieved, as well as reference to Barnet’s Air Quality Strategy. It is hard to overestimate the importance of this, given that Barnet – with its large and ever-increasing number of older people – was cited as one of the 4 London boroughs with the largest number of air pollution related deaths in 2019. Whilst working as Paediatric Registrar at Barnet Hospital my [REDACTED] became concerned about the number of children presenting with asthma-related conditions (a number of the borough’s schools are close to busy roads). Air pollution is known to badly stunt child ling development.

With much of Barnet outside the expanded ULEZ, the stated expectation (see 4.26.4) of lower air pollution and noise levels around Barnet’s major roads is very, very unrealistic, at least for the next few years. Indeed with the increases in population and economic activity anticipated in this local plan, levels of traffic (especially of large diesel vehicles) will probably increase. The areas of the major developments planned around Brent Cross and the A5 corridor already have poor air quality and it is vital that this is mitigated for the proposed large-scale residential developments there.

As Dame Sally Davies emphasised in her Annual Report of the Chief Medical Officer 2018 (Health 2040 – Better Health Within Reach) an important goal must be for individuals to be able to continuously monitor their health and their risk exposures. Barnet should - in the very near future - be included in the London Air Quality Network as well as the Mayor’s *Breathe London* real time monitoring of pollution. This would allow its residents, especially those with respiratory problems and those with children, to use the CityAir.app to know when best to negotiate Barnet’s pollution hotspots (In accordance with 8.17.2 above).

Barnet currently has two air quality monitoring stations, but I see no plans to have more. This is a shame. The costs of continuous, real time monitoring of pollutant levels have lowered dramatically of late, partly as a result of the Mayor’s Breathe London initiative (not mentioned anywhere in the 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.

Under 8.17 Promoting Health and Wellbeing I propose inserting:

“The impacts of air pollutants will be mitigated in accordance with ECC02 and as set out in Barnet’s Air Quality Strategy.”

Also under 10.9 Air pollution I propose inserting:

“Barnet will aim to be included in the London Air Quality Network as well as the Mayor’s Breathe London initiative for real time monitoring of air pollution. Positioning of real time monitoring at sites where air quality is a major concern will allow its residents, especially those with respiratory problems and parents with children, to know (through such sites as the CityAir.app) when best to negotiate Barnet’s pollution hotspots.”

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.

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 _____ Professor P.W. Piper _____ Date _____ 8/8/2021 _____



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 ECC01 –Mitigating climate change (also CDH1/2 – Sustainable and Inclusive design)

Paragraph 6.13; 10.5.5 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 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.

<p>ECC01 –Mitigating climate change (also CDH1/2 – Sustainable and Inclusive design)</p> <p>6.13 <u>Climate Mitigation and Carbon Reduction</u>. This section provides no detail of the Council’s “credible path to achieving net zero emissions”, other than “expecting all development to be energy efficient”. It is <u>completely unacceptable</u> for the plan to be so vague over such an important issue. To remedy this and thus tackle the major challenge mankind will face this century some Councils are already formulating clear and detailed strategic plans for tackling climate change. (for example, Medway.https://www.kentonline.co.uk/medway/news/councils-plans-to-tackle-climate-change-223124/) There is certainly enough expertise within Barnet to do this and it is negligent and irresponsible for it not to be given the highest priority.</p> <p>I note that there is no mention in the plan of retrofitting Barnet’s older housing stock for higher energy efficiency 6.4.5 (CDH01) only mentions optimising energy efficiency of <u>new</u> buildings. Improving the efficiency of <u>both</u> old and new dwellings should be given the highest priority, both for the Mayor’s objective of net-zero and for the benefit of residents of these dwellings.</p> <p>10 (p203) <u>Environment and climate change</u>.10.3.1 has a brief, one sentence mention of the carbon offset fund. In 10.5.5 the statement “Where carbon reduction targets are unable to be met onsite” is <u>vague, if not meaningless</u>. Also this section does not say to how the resource generated from this fund will be either maximised or used. A revised wording is suggested below. I appreciate that it is still not a legal requirement for Barnet Council to seek carbon offset funding. However Barnet should exploit this resource to the full when approving developments that are not carbon zero, since it is a very valuable way generating funds for the “credible path to achieving net zero emissions” (6.13). This resource can then be used (as is currently being done very effectively by certain other London Boroughs) to retrofit its older housing stock for higher energy efficiency (an action which would, in turn, greatly benefit the residents of this older housing stock, many of whom are on limited incomes). At present Barnet is not being very transparent about how it uses carbon offset funding.</p> <p>For the reason given above carbon offset payments should not be merely “sought” – as stated in the draft plan (10.5.5) - but “deemed mandatory” for all new developments.</p>

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.

Under 6.13 Climate Mitigation and Carbon Reduction. I propose inserting:

“To tackle the major challenge that mankind is likely to face this century Barnet will set up a cross-party Climate Change Member Advisory Group tasked with the remit of producing a clear and detailed strategic plan for tackling climate change.”.

Under 10.5.5 (p206) Environment and climate change. I propose changing the text to:

“Besides optimising the energy efficiency of new buildings Barnet will also seek to retrofit its older buildings for higher energy efficiency. Carbon offset payments will be deemed mandatory for new developments that are not carbon zero. These carbon offset payments will be used to provide part of the resource that will be needed to further the Council’s path to achieving net zero emissions.”

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.

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 Professor P.W.Piper Date 8/8/2021