



**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.*

Policies: CHW01, ECC04, ECC05 and Site Allocation No.45

**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 checked="" type="checkbox"/> | No <input 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.**

*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.*

Please refer to the enclosed representations.
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**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.*

Please refer to the enclosed representations.

**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.*

As an established local education provider and employer, the School wishes to participate in examination hearing sessions, particularly those relating to community infrastructure.

**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 - 03.08.21

MR. RICHARD HENLEY obo QUEEN ELIZABETH'S SCHOOL

Barnet Draft Local Plan (Reg. 19)

**Representations on behalf of  
Queen Elizabeth's School**

August 2021



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## Contents

1.0	Introduction.....	3
2.0	Comments on the Draft Local Plan.....	5
3.0	Conclusion.....	8

## 1.0 Introduction

- 1.1 These representations have been prepared by hgh Consulting and are submitted on behalf of Queen Elizabeth's School in response to consultation on the Barnet Draft Local Plan (Regulation 19), dated June 2021.
- 1.2 Queen Elizabeth's School ("the School") is a leading boys' grammar school located in Queens Road, Chipping Barnet. The School was founded by Queen Elizabeth I's royal charter in 1573 and has operated from its Queens Road campus since 1932. The campus (Figures 1 and 2) comprises a main academic hub with a compact arrangement of buildings in the centre of the site between two large playing fields. The campus has no planning designations in either the adopted or emerging Barnet Local Plans. The School also own a sports field to the east of Galley Lane which is used for overspill curriculum sport.
- 1.3 The School is an established local provider of education and employment to residents of Barnet and surrounding areas. It consistently ranks amongst the highest performing schools across state and independent sectors for academic results and pupil progress. The School's strong academic curriculum is complemented by an extensive enrichment programme. High quality teaching, sports, pastoral and administration facilities that can adapt to meet the School's evolving needs are vital for supporting Queen Elizabeth's School's ongoing success.



Figure 1: Queen Elizabeth School's Queens Road campus



Figure 2: Aerial image of Queen Elizabeth's School Campus and Galley Lane sports field to the west

1.4 Local plans must be consistent with national planning policy. With respect to schools, the National Planning Policy Framework (“NPPF”) (July 2021) recognises the importance of planning for schools to help meet community needs. Paragraph 95 states:

*“It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a **proactive, positive and collaborative approach** to meeting this requirement, and to development that will widen choice in education. They should:*

- (a) **give great weight to the need to create, expand or alter schools** through the preparation of plans and decisions on applications; and*
- (b) work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.” (Emphasis added).*

1.5 It is within this context that these representations are made. In summary, the School supports the Regulation 19 Plan in principle, but wishes to raise points relating to the “soundness” of the Plan in line with paragraph 35 of the NPPF. Our comments on the draft Local Plan are provided in the following section.

## 2.0 Comments on the Draft Local Plan

2.1 This section reviews and comments upon the draft policies and supporting text within the Barnet Draft Local Plan (Regulation 19). Each subsection deals with policies affecting different areas including: the main School campus, the School's Galley Lane sports field and the nearby draft site allocation 'Land at Whalebones'. Minor amendments are proposed to the draft policies, with a view to ensuring the Plan is positively prepared, justified, effective and consistent with national policy.

### The Main School Campus

2.2 At paragraph 3.2.2, one of the key objectives for the Local Plan is to meet social infrastructure needs. This carries through to paragraph 4.2.1, where the introductory text to the draft Plan's spatial strategy recognises that, "*New housing remains a key component of planned growth, and this must be accompanied by suitable supporting infrastructure including transport, schools, healthcare and open spaces.*" Policy GSS01 (Delivering Sustainable Growth) sets out the Plan's intention to create conditions for sustainable growth to deliver community facilities to meet Barnet's needs. At paragraph 8.7.1, the Plan notes that: "*Excellent educational outcomes and ensuring children and young people are successful in life and equipped to meet the needs of employers are vital to Barnet's future success.*"

2.3 The Plan's prioritisation of social infrastructure provision, and specifically of school facilities, is supported. In the following paragraphs, we suggest some amendments that seek to ensure the plan robustly supports the provision and expansion of school facilities.

2.4 Policy CHW01 (Community Infrastructure) says the Council will work with partners to ensure that community facilities, including schools are provided for Barnet's communities. Part b) of the policy provides support for the enhancement and inclusive design of community infrastructure. Part i) adds that the Council will support providers of new and improved educational facilities within the Borough. These are sound principles, however, we consider the draft policy does not offer the same level of support for development at schools to correspond with paragraph 95 of the NPPF. In particular, part i) of the policy lacks specificity as to how educational providers will be supported. It is recommended that this part of the policy is expanded to include the red text below, to read:

*"The Council will:*

- i) Support providers **and promoters** of new and improved educational facilities within the Borough, such as those at Middlesex University's Hendon campus, **by affording great weight in planning decisions to the need to create, expand or alter these facilities**, and will encourage the provision of further and higher education programmes, skills training and continuing professional development programmes, business support initiatives and applied research."*



- 2.5 Paragraph 95 of the NPPF also encourages local authorities to take a proactive, positive and collaborative approach to working with school promoters, both with regard to pre-application discussions and planning decisions for development at school sites. This is not currently reflected in draft Policy CHW01 and we propose that a subsection is added to the policy to establish this objective, for example:

*“The Council will adopt a proactive, positive and collaborative approach to working with school promoters through pre-application discussions and planning applications to support the delivery of new and expanded educational facilities.”*

- 2.6 Incorporating these recommendations into the draft Plan will assist with delivering educational facilities in a timely manner to sustain the supply of school places, thereby accommodating predicted population growth and supporting Barnet’s planned housing targets. High quality, flexible and well-designed facilities are vital for the academic success of educational institutions such as Queen Elizabeth’s School. Revising the Regulation 19 plan to adopt a more proactive approach to planning for schools will help Barnet’s educational establishments respond to evolving academic, sporting and pastoral needs and trends. Our recommendations are entirely consistent with national planning policy and recent legislation<sup>1</sup> that seeks to prioritise and ‘fast track’ planning applications for school development proposals and extend permitted development rights for school buildings.

#### **The Galley Lane Sports Field**

- 2.7 Policy ECC04 (Barnet’s Parks and Open Spaces) sets out the Plan’s support for the provision of sports facilities. This objective is endorsed by the School.
- 2.8 Policy ECC05 (Green Belt and Metropolitan Open Land) advises that development proposals within the Green Belt will be considered in accordance with NPPF paragraphs 133 to 147. With the publication of the revised NPPF in July 2021, the paragraph references within the policy should be amended to paragraphs 137 to 151.

#### **Land at Whalebones**

- 2.9 Draft site allocation No. 45 in the Regulation 19 Plan is ‘Land at Whalebones’. The site is located to the south of the School on the opposite side of the A41 (Figure 3). The draft Plan proposes allocating the site for 152 dwellings, local open space and community facilities. The School wishes to comment upon the proposed allocation to request that the Council secure appropriate provisions (both during construction and operational phases of the development) within the Plan to prevent any undue impacts upon the School’s operation and ensure pupil safety.

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<sup>1</sup> The Town and Country Planning (Development Management Procedure and Section 62A Applications) (England) (Amendment) Order 2021 and The Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2021



Figure 3: Land at Whalebones

### 3.0 Conclusion

- 3.1 The School supports the Regulation 19 Plan in general. The comments raised in this representation would enhance the “soundness” of the Plan in line with paragraph 35 of the National Planning Policy Framework (“NPPF”) (February 2019) to ensure the Plan is positively prepared, justified, effective and consistent with national policy. The recommended revisions would ensure that the Regulation 19 Plan fully endorses the provision of educational facilities that are necessary to sustain the academic excellence of schools such as Queen Elizabeth’s School and supply the community infrastructure to support planned housing growth.
- 3.2 We will of course be pleased to clarify and/or discuss these representations at any time.



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