

Barnet Draft Local Plan

Publication Stage Representations Form

(For official use only)

Ref:

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 .	_BSS01	Paragraph _	4.6.2	Figure/	Table
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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 x	No 🗆
b)	Sound	Yes 🗆	No x
c)	Compliant with the Duty to Co-operate	Yes x	No 🗆

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.

Barnet's Spatial Strategy – Barnet Playing Fields.

The proposed sport and recreation hub comprises a large building, a floodlit outdoor games area and parking for 65 cars. I believe this is a breach of the openness of the Green Belt.

Parks and open spaces should be among the highest priorities for the council. They contribute significantly to the quality of life for residents; and are a key reason why people move to Barnet. With the expected increase in population, they will become every more important, not least because many new homes being built either have small gardens or none at all.

Additionally, there are existing sport and recreation facilities for community use at the nearby Totteridge and Ark Pioneer Academies. This proposal, therefore, is not value for money and I do not believe that demand for this proposal has been demonstrated.

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.

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The council needs to demonstrate that this proposal is needed in this area, given the facilities already available.

If it is demonstrated that they are needed, then a reduced scheme should be considered – one that complements the existing sporting facilities.

Continue on a separate sheet if necessary

Please note:

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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)	х
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.

I would like the opportunity to elaborate on the importance of retaining green belt land.

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Signature	Theresa Villiers MF	Date	09.08.21	



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PART B - Your representation

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Policy	_GSS01	Paragraph	_4.4.5	Figure/Table
5				

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 x	No 🗆
b)	Sound	Yes 🗆	No x
c)	Compliant with the Duty to Co-operate	Yes x	No 🗆

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 2021 London Plan target is for 35,460 – why is the Barnet Plan proposing 46,200 new homes?

The MHCLG target of 5361 new homes is excessive. The borough should not attempt delivery on more than 2634 target in the March 2021 London Plan. Even this target is far too high but there is no possible justification for trying to exceed it.

Additionally in para 4.5.1, Barnet is proposing to deliver 27,000 new jobs. I note from the comments made by the Federation of Residents Associations in Barnet that they are questioning whether this figure is net or gross. They point out that there will be job losses to make way for housing in areas such as Homebase in North Finchley, Brake Shear House in High Barnet and the North London Business Park among others. Clarification needs to be provided on this figure.

Continue on a separate sheet if necessary

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Clarification as to the figures mentioned above.
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The provision of housing in my constituency of Chipping Barnet is an important issue for my constituents, particularly when large developments are planned without the necessary infrastructure being put in place.

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Policy _____GSS12_____ Paragraph __page 77______ 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 x	No 🗆
b)	Sound	Yes 🗆	No x
c)	Compliant with the Duty to Co-operate	Yes x	No 🗆

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.

I oppose this policy. Residents and local businesses need car parks. Building over car parks will make life harder for residents in a borough which the council acknowledges is car-dependent.

Lateral cross borough public transport is limited and many people, especially the elderly and people with young children, depend on their cars for many journeys. A policy supporting building over car parks will have an especially negative impact on disabled people and is out of line with the council's equalities duties.

I am particularly concerns about car parks at stations such as High Barnet, Cockfosters, Finchley Central. It is vital that these are retained because they perform an important park and ride function encouraging public transport use.

The Mayor of London's proposals to replace the car parks at these stations with high density blocks of flats are completely unacceptable. The fact that there will be no off-street parking for these new flats will mean great pressure on surrounding roads already crowded with parked cars.

Additionally, as pointed out by the Barnet Society, this problem will be exacerbated by the major developments around the M25 being proposed by Hertsmere. And in their comments on GSS09 (Existing and Major New Transport infrastructure), they point out that a distinction must be made between stations at the end of a line or on the edge of the TfL area and stations closer in.

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.

The council should review this part of the plan and reconsider its support for developing station car parks for residential use.

Also distinguish between those stations at the end of a line or on the TfL area and stations closer in, in the Local Plan.

Please note:

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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.

I wish to stress the importance of retaining car parks. The council needs to take into account developments in nearby boroughs that will impact on Barnet's need for parking provision at transport hubs.

Declaration of consent

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Signature ____ Theresa Villiers MP_____ Date ____09.08.21_____



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Policy ____CHD04_ _____ Paragraph __page 129_____ 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 x	No 🗆
b)	Sound	Yes 🗆	No x
c)	Compliant with the Duty to Co-operate	Yes x	No 🗆

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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In my view, a building should be considered "tall" if it more than six storeys. I would also express concern about the implication that buildings of eight storeys or more could be considered suitable for the Great North Road. This may be a main road but it passes through the low-rise outer suburb part of our borough for which eight storey buildings are completely inappropriate.

However, I support the principle that tall buildings should be confined to certain designated areas and should be turned down in other places.

Blocks of six or seven storeys would seriously intrude into views from open spaces and green belt if allowed outside specified locations.

An example of this was in the application for the Victoria Quarter site. Under these proposal, blocks of flats would overlook the adjoining park and existing housing. The detriment to the landscape, particularly in Victoria Recreation Ground, resulting from these proposals would reduce many residents' amenity and enjoyment of what has long been, and remains, a neighbourhood populated by largely by low-rise semi-detached and terraced family housing.

Continue on a separate sheet if necessary

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As Barnet is predominantly low rise, the council needs to assess all areas of the borough to set an upper limit for each area so that inappropriate planning applications for tower blocks – such as the North London Business Park – would fail.

Please note:

Continue on a separate sheet if necessary

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This is an issue in which my constituents have concerns and I wish to elaborate on the need for a review to determine what is acceptable in each area.

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Policy _____ HOU02_____ 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 x	No 🗆
b)	Sound	Yes 🗆	No x
c)	Compliant with the Duty to Co-operate	Yes x	No 🗆

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.

I share the concerns of the Federation of Residents' Associations of the London Borough of Barnet (FORAB) and the Barnet Society about the over-provision of one and two bedroom units when it has been identified that three bedroom homes are needed in the borough. 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 policy should be reviewed to ensure that encouragement is given to developers to provide three bedroom homes, preferably with gardens.

Please note:

Continue on a separate sheet if necessary

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Housing is a major issue for my constituents.

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Policy _____ HOU03_____ Paragraph ______ Figure/Table ______

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Residential Conversions and replacement of larger homes.

The Federation of Residents' Associations in the Borough of Barnet points out that, as this policy is currently worded, it is not effective in resisting the trend towards smaller units.

The council has always resisted conversion of houses into flats and this should continue in the emerging plan.

The identified housing need in the borough is for three bedroom family homes (preferably houses with gardens) and I am concerned that the emerging plan, as currently drafted, does not secure that aim. It is therefore not a legally sound way to deliver long established council policy.

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Re-word this policy so that the importance of delivering three bedroom homes is clear.

Please note:

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Policy CDH01_____ Paragraph _____ Figure/Table _____

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Design is likely to be of importance in the Government's reforms for planning. And any schemes referred to the Mayor of London must show that a design review has been undertaken. However, it appears that design is not a priority in most planning applications submitted to Barnet. 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.

Barnet Council should have a policy relating to design which takes into account the area to which the site of the planning application refers.

The Federation of Residents' Associations in the Borough of Barnet (FORAB) makes the suggestion that a Design Review Panel of qualified individuals should be established to review all schemes over a certain size or in sensitive locations.

Additionally, as indicated in D4 of the London Plan, design review should be part of the public consultation process.

Lastly, FORAB points out the lack of any reference to fire safety in this policy. As this is mentioned in the London Plan policy D4, the council should ensure that this is reflected in their policies.

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.

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Signature _____ Theresa Villiers MP_____ Date _____09.08.21_____



Barnet Draft Local Plan

Publication Stage Representations Form

(For official use only)

Ref:

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 _ECC04_____ 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 X	No 🗆
b)	Sound	Yes □	No X
c)	Compliant with the Duty to Co-operate	Yes X	No 🗆

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.

Barnet's Parks & Open Spaces

The Barnet Society comments that the assessments carried out under this policy are fundamentally flawed. For example, Hadley Wood is assessed as 'low quality and low value'.

Following local objections to some assessments, both councillors and officers have indicated that the Parks and Open Spaces Strategy assessments were not helpful and needed review.

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.

Section E should be reworded along the following lines:

No green spaces listed in the Barnet Parks and Open Spaces Strategy should be considered for development.

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.

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Barnet Draft Local Plan

Publication Stage Representations Form

For official us

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?

I am deeply concerned about the inclusion in the emerging Local Plan of a list of sites designated for development.

It seems that the presence of a site in this list makes it far more difficult than it is currently for the council's planning committee to turn down and application. This list therefore undermines democratic input into planning decisions. The list pre-judges the outcome of planning applications without providing anything like the scrutiny that would normally be given to a planning application.

I have especially strong objections to the inclusion of the following four sites in the list.

<u> Site No 44 – High Barnet Station</u>

I am totally opposed to this site being included in the Schedule given the importance of retaining the car park for public use and the overbearing nature of the proposal (6-7 blocks).

Site No 45 – Land at Whalebones

It would be completely wrong to develop this green field site in a conservation area. The council's planning committee was correct to turn down the recent planning application and should not have their decision undermined by including the fields in the Reg 19 sites list.

Site number 30 - Finchley Central Station

I object to this site being on the list for the same reasons as set out above in relation to High Barnet station car park. This proposal is even worse. The height of the building and excessive number of units makes this proposal completely unacceptable.

Site 22 New Barnet Sainsbury's

It would be unacceptable to build 199 flats on the Sainsbury's site.

I am also opposed the following locations being included in the sites list because of the overdevelopment they would involve:

Sites 3 and 4 in Brunswick Park ward

Site 43 Army Reserve depot Chipping Barnet

Site 52 Kingmaker House

Site 55 and 56 Woodside Park station

Sites 16 and 18 in Fast Rarnet ward

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_____ 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 x	No 🗆
b)	Sound	Yes 🗆	No x
c)	Compliant with the Duty to Co-operate	Yes x	No 🗆

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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I believe that the sites set out above should be withdrawn from the Schedule of Site Proposals.					

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Declaration of consent

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Signature	Theresa Villiers MP	_ Date	09.08.21	
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