Conservative Group Response to Local Plan Modification

Thematic Concerns

- 1. In para 3.2.2 12 key objectives are listed. However, there are inevitably conflicts between the objectives. For example, the proposed planning context for the Edgware major town centre meets objective 2 but is clearly in conflict with objective 6 (Conservation and Enhancement of the historic environment). It is not clear that this is successfully resolved in the way GSS05, in particular, has been developed.
- 2. Objective 7, to support strong and cohesive family-friendly communities, requires an understanding of the diverse needs of the different communities that make up Barnet. At the moment, the plan is a community plan and does explicitly recognise that there are significant communities in Barnet with larger than average family sizes which therefore require a different mix of housing than other community groups. As a result, objective 3 is not properly being met as it again does not reflect the diversity of the Barnet communities.
- 3. The provision of additional housing units in Barnet can improve the position of those existing residents of Barnet living in inadequate housing or temporary accommodation. The plan does not, however, seem to consider the difference between policies which are designed to improve the position of the existing residents of Barnet and policies which promote the growth of Barnet by new residents coming to the borough to take advantage of new provisions but with the unfortunate effect of crowding out less affluent existing residents; the contrast between local needs and national housing need.
- 4. The changes that are being made to make it easier to convert large residential houses in policies HOU03 and HOU04 to create HMOs unless they have an unacceptable impact on local amenities is very strong. We would urge that the concerns of the local communities should be given a higher weighting and the word 'unacceptable' should be removed and replaced with 'detrimental impact'. In addition, in MM36C Houses in Multiple Occupation, in the final sentence of section C after the word 'accommodation', we would urge the addition of 'or the need for the accommodation which it is proposed that the HMO be converted into is strongly demonstrated'.

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Other Comments

- 1. MM16, SECTION B: Waste Management facility. Since the local plan process was started an additional waste management facility site has been identified in Wembley. The closure of the Hendon Waste Transfer station was as a result accelerated for the benefit of the wider development and the operation moved on a 5 to 7-year lease to the Wembley site. The move to the Wembley site has been successful and it is now recognised that the Wembley site is a better site for waste management than the site in the BRENT CROSS WEST (STAPLES CORNER) GROWTH AREA. Particularly given its proximity to the new station and the high PTAL rating. Discussions are ongoing between the council, North London Waste Authority and the Landowner for the permanent relocation of the waste management facility. We would suggest that the plan recognises this new reality so that in the event that the move is successful the site within the growth area can be used for housing.
- 2. MM46. The revisions to the plan significantly weaken the protections against Tall Buildings which are rarely well regarded locally. The position with regard to GSS02 GSS03 GSS06 GSS04 and GSS10 are now well established. However, we do not understand how policy GSS05 can be regarded as being consistent with objective 6. We would also propose that when the council produces the 'Design for Density (Supplementary Planning Document)' the impact of Tall Buildings on the amenity of residents affected by the building, is specifically considered and guidance is given as to how the impact on residents will be taken into account into any planning decision so that resident amenity is not materially affected.
- 3. In relation to 6.18.2, we would suggest the deletion of Edgware for the reasons noted above.
- 4. In 6.18.3, the words 'so not to detract from the nature of surrounding places and the quality of life for those living and working around them' have been deleted. We believe that it is extremely important that the concept of considering the impact of the building on those currently living in the area should not be excluded from the planning consideration.
- 5. Question re MM46: In section 6.18.12 certain views are protected, does the description of view 3 preclude a tall building on Golders Green underground station? If it does not,

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the description of the view should be amended to ensure it does preclude such development.

- 6. Re MM55Bc: please can we add 'and the potential for antisocial behaviour'?
- 7. Re MM57Ab: not clear what this section means.
- 8. RE MM57 CHW01: the policy refers to places of worship, which are then not mentioned in the policy detail. As communities evolve the needs of places of worship and their associated community usage can vary as communities age and, on some occasions, decline. The policy should allow a degree of flexibility, particularly in regard to places in worship to allow them to be adapted to the changing needs of communities as they evolve.
- Re MM67: It is not clear whether the policy allows the development of facilities within Barnet's parks and open spaces for the benefit of local communities including pavilions such as Cafes, changing rooms or gardening storage areas.
- 10. Policy TRC01: Barnet as a borough has the highest levels of nonagenarians in London. This policy does not recognise the demography that exists in Barnet and has no regard for it.
- 11. In MM74A, in relation to item 7, should there not be info on the number of licensed HMOs the quality of HMOs in the borough and the number of larger Home units converted to 2 or more units?