

From: [REDACTED]
To: [Forward Planning](#)
Subject: Concerns regarding Barnet Local Plan Main Modifications
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Representation from : Alison Tomb

Address : [REDACTED]

I am writing to express concerns regarding the Barnet Local Plan and its modifications ("BLPM"). As a lay person it is almost impossible to digest the volume and complexity of the Local Plan and its related documents, which I have not previously been aware existed. Its not as far as I can recall been publicised to those of us who are going to have our lives materially and adversely impacted by it, living near a designated Opportunity Area. I haven't been able to locate what the precise Modifications are or those that would impact the Edgware development in particular or even locate the Schedule of Site Proposals so I am unable to comment as fully as I would like.

My concerns relate to Policy CDHO4 Tall bulidings and whether it follows London Plan Policy ("LPP")D9 (and takes sufficient regard of the National Planning Programme Framework which refers to adding to the quality of an area, being attractive and sympathetic to local character and history). Assuming that the Edgware development ("the Development") is deemed to be in compliance with the BLPM as it already seems to have outline planning approval, I query that the BLPM adequately meets the criteria set out in the LPP Section D9 and therefore whether the criteria applicable to for instance visual impacts, cumulative impacts and Section 3.9 relating to Tall Buildings, etc have been appropriately reflected in the BLPM.

Examples of where the Development varies from the LPP :-

- Given that the Development will involve Very Tall Buildings (several 20 storey + flats) and will stand on an elevated piece of land, it will clearly adversely affect local views.
- Given the Development is being built in the midst of low level residential housing (apart from one 17 storey block that somehow Barnet approved) and a relatively small High Street, it does not meet the criteria of "mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality."
- It also does not appear to meet the criteria - "immediate views from the surrounding streets – Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy." My house will back onto the development - the intervening rail line is being used as an argument for "appropriate transition" - which given the heights involved is clearly nonsense.
- The LPP refers to consideration of cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Whilst general considerations seem to have been carried out in respect of the Development, none seem to deal adequately with excessive height of the buildings and the density of occupation.

Section 3.9.1 Tall buildings....

"2. in these locations, determine the maximum height that could be acceptable". I am not

aware this was ever set for the Development. Should not the BLPM have very specific guidance as to the need to determine maximum height at a very early stage and how that should be arrived at? Should LBB not set a maximum height now to apply for the borough - which should be far less than the 20+ storeys being imposed in Edgware?

"3. identify these locations and heights on maps in Development Plans." Has this been done, been made available?

"3.9.4 The higher the building the greater the level of scrutiny that is required of its design." There is no evidence that the excessive heights involved in the Development have ever been subject to a sufficient level of scrutiny - surely the BLPM should apply a very high level of scrutiny and consultation when Very Tall Buildings are being proposed?

"3.9.8 The base of the tall building is its lower storeys..... The base should integrate with the street frontage of adjacent buildings and, where appropriate, enable the building to transition down in height." The Development has no meaningful transitioning in height.

"3.9.9 Any external lighting for tall buildings should be minimal, energy efficient and designed to minimise glare, light trespass, and sky glow, and should not negatively impact on protected views, designated heritage assets and their settings, or the amenity of nearby residents." The Development has clear light trespass implications on local low level residential housing - I know that the light entering my house will be substantially reduced by it.

And the LPP's general reference to building strong communities, the protection of High Streets clearly are being misapplied when it comes to the Development - Edgware High Street will be decimated by this over the next ten years and the existing Edgware community spirit will cease to exist.

I don't know if it is referenced in the policy but the assumption that because Edgware is a "transport hub" there will be a need for fewer car parking spaces is nonsensical. People drive into Edgware from the M25 and beyond to take the Northern line, they don't come by bus etc- this is evidenced by the people who park in my road. Remove or reduce the existing parking and local roads will become parking nightmares (even more than they are now).

Finally, it seems that if an area is designated an Opportunity Area or a Strategic growth area, there is less scrutiny and fewer protections that apply - the policies set out in the LPP or the NPPF do not seem to be adequately adhered to in these instances - there is nothing in effect in the BLPM to protect Barnet from developments like that proposed in Edgware which is widely acknowledged as being of excessive height and density for its location.

Regards

A Tomb