



**Main Modifications
Local Plan**

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 Main Modification does your representation relate?

Representations must be made on a specific Main Modification (MM) or Policies Map change

MM Number: MM61

Policy: ECY01

Paragraph: 9.9.4

Question 2: Do you consider that the Main Modification is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

- | | | |
|--|------------------------------|--|
| a) Legally compliant | Yes <input type="checkbox"/> | No <input checked="" 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 type="checkbox"/> |

Question 3: Please give details of why you consider the Main Modifications 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.

The current drafting of Policy ECY01 is not consistent with the London Plan (2021).

Whilst the current wording of Policy ECY01 part B(e) implies co-location schemes can come forward in accordance with London Plan Policy E7, there are no allocations identifying where co-location schemes could come forward within Barnet, as required by London Plan Policy E7.

The requirement for co-location development to be "employment led" within Policy ECY01 part B(e) and paragraph 9.9.4 is also inconsistent with London Plan Policy E7. Co-location schemes may incorporate more residential floorspace as a proportion of floorspace within a scheme, whilst providing no net loss of industrial floorspace. Policy E7 of the London Plan requires that development provide equivalent industrial floorspace only. This requirement for "employment led" imposes an unnecessary restriction on co-location schemes that could impact on their viability and hinder the intended objective of co-location development – to support the release of land for further housing in London.

Continue on a separate sheet if necessary

Question 4: Please set out the modification(s) you consider is/are necessary to make the Main Modification legally compliant and sound with 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 removal of "employment-led" from the policy and supporting text

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).

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.

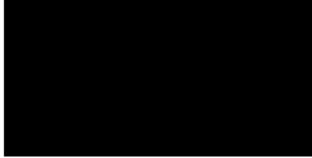
Your details will be kept in accordance with the Council's Privacy Notice, until the Local Plan is adopted plus a further five years to evidence that a fair and transparent process has been followed. Processing is kept to a minimum and data will only be processed in accordance with the law. We will take 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 22/05/2024



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Local Plan**

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Please complete a separate Part B for each representation and return along with a single completed Part A.

Question 1: To which Main Modification does your representation relate?

Representations must be made on a specific Main Modification (MM) or Policies Map change

MM Number: MM13 and MM27

Policy: GSS01 and GSS09

Question 2: Do you consider that the Main Modification is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

- | | | |
|--|------------------------------|--|
| a) Legally compliant | Yes <input type="checkbox"/> | No <input checked="" 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 type="checkbox"/> |

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Removal of the 950 homes at WLO stations within Policy GSS01 is not considered to accord with the aspirations of the Mayor's Transport Strategy, the London Plan or the agreed position with TfL. Retention of a strategic number of homes would promote the emphasis required to deliver new homes in these accessible locations.

Continue on a separate sheet if necessary

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Restate requirement to deliver high-density housing around WLO stations, including 950 homes and investigate opportunities for suitable site allocations.

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Signature

A solid black rectangular box used to redact the signature of the individual.

Date 22/05/2024