

## **Barnet Unitary Development Plan (UDP) Saved Policies**

Dear Cabinet Members,

Please see below comments on Agenda Item 6 at tonight's Cabinet Meeting.

When referring to Council Policies listed below, we are concerned that many of the comments and recommendations for not asking the Secretary of State to save certain UDP policies are based on incorrect information.

In many cases the officer making these recommendations cites duplication of National/London Policy as the reason for deleting a Council Policy. We show below that this so called 'duplication of policy' is no more than that Council Policy contains some words included in the National/London Policy. The author of the recommendations fails to mention that Council Policy in fact includes detailed additional information, which enhances the protection that a particular Council Policy gives to Green Belt and Metropolitan Open Land.

In every case the officer fails to mention that Barnet Council Policy on Green Belt specifically includes Metropolitan Open Land as being covered by these policies. National Policy does not specifically mention Metropolitan Open Land as being included.

As the detail of proposed changes only came to our attention yesterday we have not been able to review the majority of the proposals, so have concentrated on Green Belt and Metropolitan Open Land issues. We also note however that the officers' report recommends that:

- 1) HC Policies should not be saved because they repeat National Policy in PPG15 and PPG16; since these PPGs are currently being revised, probably radically, this is completely the wrong time to abandon Barnet's own policies, until the new Government guidance is in place and its implications for Barnet known
- 2) Recommendations not to save a number of ENV Policies where it is alleged that they repeat National or Regional guidance, do not bear closer examination. For example, Policies ENV 7A, ENV 8, ENV 9, ENV 10 & ENV 11 all include specific direction that is not in Regional or National Policy, as claimed in the Cabinet Report. Removal would weaken local policy. There should therefore be a review of the content of each policy before a decision is made not to save it.

We ask that you save the Council Policies in the current UDP, listed below.

The Government Office for London (GoL) has advised us that third parties have until 8<sup>th</sup> May to comment on this matter. Please note that Civic groups in Barnet will be sending detailed comments

on Barnet Council's proposed UDP Saved Policies to Gol.

Please confirm when Barnet Council sent its proposal for UDP Saved Policies to the Government Office for London? I make this request under the Freedom of Information Act.

Yours sincerely,

Mike Dawson, on behalf of:

Finchley Society

Federation of Residents' Associations in Barnet

North Finchley Agenda 21

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### **Council Policy O1 – *Green Belt/Metropolitan Open Land***

Policy O2 includes 'Metropolitan Open Land' in its definition of what land is covered by rules governing openness.

**National** and **Regional** policies do not include 'Metropolitan Open Land' their definitions of 'Openness'.

Further, Council Policy gives as a reason not to allow development in the Green Belt/ Metropolitan Open Land, the fact that a development,

**“...would harm...”**

the visual amenity.

In contrast, **National – PPG2** policy states that visual amenity,

**“...should not be injured...”**

The fact that a development can be refused on the grounds that it '**would harm**' visual amenity is a much stronger policy than one, which merely suggests visual amenity '**should not be injured**' by a development.

Council Policy, therefore, does not merely repeat Government Policy, it further defines and strengthens the intended safeguards.

**Policy O1** should be saved.

**Council Policy O2 – Green Belt/Metropolitan Open Land – New Buildings and Uses:**

Policy O2 includes ‘Metropolitan Open Land’ in its definition of what land is covered by rules governing restrictions on ‘New Build’.

**National - PPG2**, item *New Buildings*, 3.4, does not include Metropolitan Open Land.

Council Policy, therefore, does not merely repeat Government Policy; it further defines and strengthens the intended safeguards.

**Policy O2** should be saved.

Cabinet members are no doubt aware an appeal continues in Hendon, where an attempt is being made to build on Metropolitan Open Land. Removal of Policy O2, would prejudice this appeal.

**Council Policy O3 – Green Belt/Metropolitan Open Land**

**National – PPG2**, Green Belts, item 3.6, does not include as a reason not to allow extensions to buildings in the Green Belt that there would be:

**“...an over-intensification of use or harm the open character of the land and its purposes or objectives.”**

Council Policy, therefore, does not merely repeat Government Policy; it further defines and strengthens the intended safeguards.

**Policy O3** should be saved.

**Policy O5 – Green Belt/Metropolitan Open Land – Replacement of Existing Dwellings**

**National – PPG 2**, *Green belts*, paragraph 3.6

Misrepresentation by the officer of how Council Policy duplicates PPG 2, is a serious matter.

Indeed, far from duplicating policy, **Council Policy O5** gives reasons why replacement will not be allowed, factors that are not mentioned in PPG 2, 3.6:

**“The replacement of existing dwellings in the Green Belt or Metropolitan Open Land will not be permitted where they would have a greater adverse impact on the openness of the area or the purposes of including land in it, compared with**

**the dwellings they replace.“**

Council Policy, therefore, does not merely repeat Government Policy; it further defines and strengthens the intended safeguards.

**Policy O5** should be saved.

**Policies requested to be saved from the proposed list of UDP Policies to be deleted:**

**ENV 7A**

**ENV 8**

**ENV 9**

**ENV 10**

**ENV 11**

**HC 3**

**HC 4**

**HC 9**

**HC 10**

**HC 11**

**HC 12**

**HC 13**

**HC 16**

**HC 18**

**HC 19**

**HC 20**

**HC 21**

**O 1**

**O 2**

**O 3**

**O 5**