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**Barnet Local Plan
Examination
Response to Matter 2: Spatial
Strategy and Strategic Policies**

Taylor Wimpey Strategic Land

19 August 2022

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1.0 Introduction

- 1.1 This statement to Matter 2 (Spatial Strategy and Strategic Policies) of the examination of the Barnet Local Plan ('the Plan') is submitted by Lichfields on behalf of Taylor Wimpey Strategic Land (TWSL). It follows the submission of representations to the Regulation 19 Draft Local Plan (June-August 2021).
- 1.2 The National Planning Policy Framework ('NPPF') outlines that during the examination process a Local Plan must demonstrate that it has been positively prepared, is justified, is effective and is consistent with national policy. Outlined below are responses to a select number of the Inspector's questions which set out why we consider changes to Barnet Local Plan are necessary to ensure the soundness of the Plan.
- 1.3 The Council has prepared a schedule of proposed minor modifications that it wishes to make to the Plan. Reference is therefore made to the policies and paragraphs within the Plan version incorporating the schedule of minor modifications, unless otherwise stated.

2.0 **Response to Inspector's Questions**

Question 6: Is the approach of strategic policies relating to the spatial distribution of development, positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan?

a) What is the basis for the calculation and identified distribution of housing and employment growth as set out in Policy GSS01 in terms of Growth Areas (Policies GSS02 to GSS07), District Town Centres (Policy GSS08), areas of Existing and Major New Public Transport Infrastructure (Policy GSS09), areas of Estate Renewal and Infill (Policy GSS10), Major thoroughfares (Policy GSS11) and Redevelopment of Car Parks (Policy GSS12)?

b) Is such an approach in seeking to guide and deliver development to the aforementioned areas, appropriate and justified?

- 2.1 The Draft Local Plan identifies a housing need for Barnet of 35,460 new homes (2,364 per annum, London Plan 2021 target) over the Plan Period from 2021 up to 2036, while providing a supply of sites for up to 44,000 new homes (3,134 per annum). Policy GSS01 and Table 5 set out how the housing targets will be met.
- 2.2 The strategy outlined in Policy GSS01 and Table 5 is not sound, as it is over reliant on large and complex urban regeneration sites to deliver the homes required, and is not compliant with London Plan Policy H2 with regard to small sites. Compliance with London Plan Policy H2 is further explored separately in response to Matter 3 Question 6.
- 2.3 The proposed strategy for meeting housing need is overly optimistic and not sound as the over-reliance on complex urban regeneration sites is likely to have an adverse impact on early housing delivery. There is insufficient evidence provided that these large urban regeneration sites will deliver in the required timescales and at the rates indicated. With only a limited source of supply there is a great risk of under delivery if any one site does not deliver. This issue has previously been acknowledged in Barnet's Housing Delivery Action Plan (2021) which states that:
- 'high dependence on larger sites results in a potential risk to overall future delivery, given the broad reliance on meeting a significant proportion of the target for new homes through a small number of very large schemes. For these schemes, experience shows that they can often have more complex issues that require resolving, and these can therefore have the potential for significant delays.'*
- 2.4 For example, the Brent Cross Growth Area is proposed to deliver 7,500 homes by 2036. Section 4.15 of the draft Local Plan notes that the development of the Brent Cross Growth Area is dependent on factors relating to land ownership, viability and phasing. The existing outline planning application was approved in 2010 and is likely to need to be supplemented through further planning applications to update areas of the masterplan. The size, complex history and landownership arrangements of this site make it difficult to guarantee that 7,500 homes will be delivered by 2036 and sufficient evidence is not provided to justify this.

- 2.5 At Edgware Town Centre, 5,000 new homes are expected to be delivered by 2036, with 3,350 of these by 2031. However, the Council has not yet received any development proposals for this site (as of June 2021, see Annex 1 of the draft Local Plan) and does not indicate that they have had discussions with developers or landowners. There could be complex issues to do with landownership, viability or previous uses of the site which may delay delivery, and these do not appear to have been sufficiently assessed.
- 2.6 The Edgware Growth Area SPD (2021) notes that there are a number of private and public landowners within the Growth Area including Ballymore Group, Transport for London and Sainsburys (longstanding leasehold interest). Paragraph 8.10 of the SPD states that *'In some instances, development may be most effectively realised through a process of land assembly. While it is anticipated that this process will be carried out through negotiation, the councils will pursue the option of compulsory purchases orders (CPO) if required.'* It can take many years to resolve complex landownership issues. Therefore, insufficient evidence is provided that 3,350 homes will be delivered in Edgware Town Centre by 2031, and 5,000 by 2036.
- 2.7 The two examples above indicate that the reliance on large sites in the draft Local Plan is not justified. The Plan is therefore not sound in this regard.
- 2.8 In order to make the plan sound the strategy for meeting housing need should be amended to include more smaller and medium sized sites being allocated as these would provide a greater supply source and are more likely to be able to deliver in the shorter term.
- 2.9 Land to be allocated for housing to ensure the delivery required, could include targeted release of individual pockets of Metropolitan Open Land (MOL), where it is identified that the MOL is not serving any of the main functions for keeping that land open, where they are providing no public benefit and where those sites are sustainably located. For example, the land to the east of Colney Hatch Lane, which Taylor Wimpey Strategic Land has an interest in, is one example of MOL land which is suitable to deliver housing or potentially other uses that could then free up other land for housing. It is a relatively small site which is a vacant former ILEA playing field site. It is isolated from other MOL, as it is surrounded by roads and development and therefore serves no real purpose as MOL. It does not provide any public benefit in terms of useable public open space and recreation, as it is not publicly accessible. The site is unconstrained, available and deliverable within the plan period.
- 2.10 In order to achieve a sound strategy, the Council need to allocate more small/ medium sized, available and deliverable sites (such as that at Colney Hatch Lane) that could deliver homes or other forms of development in the shorter to medium term, to supplement delivery from the larger, more complex regeneration sites to deliver housing on a regular basis. This would ensure that a five-year housing land supply is in place and provide other benefits such as the earlier provision of affordable housing.

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