



Examination into London Borough of Barnet Local Plan

Stage 2 (Matters 8 – 12)

Matter 10

Representations on behalf of
DTZ Investors UK Ltd (on behalf of Strathclyde Pension Fund)

(Respondent reference number 41)

MATTER 10: SITE ALLOCATIONS

MATTER STATEMENT – MATTER 10

1. These Representations are made on behalf of “DTZ Investors UK Ltd” (“DTZ”), in response to the Inspectors’ Matters, Issues and Questions published on 12 July 2022. DTZ submitted written representations to the Regulation 19 Consultation of the Barnet Draft Local Plan in August 2021, in relation to the effective use of land.

MIQ 10.7 Are the proposed allocations and associated development requirements and principles identified in Annex 1 of the Plan – justified, effective, consistent with national policy and in general conformity with the London Plan?

What particular part of the Plan is not legally compliant and/or unsound?

2. There are no site allocations identified in Annex 1 that would fall within the broad location of the New Southgate Opportunity Area (NSOA) boundary, as it is currently shown on the Key Diagram. This is in spite of its London Plan designation as one of ‘the capital’s principal opportunities for accommodating large scale development... and having the highest expectations for delivering new homes and new jobs¹..’
3. Instead, draft policy GSS09 stipulates potential for at least 250 new homes, and no new jobs targets within NSOA. These figures are not conducive to delivering close to the quantum of new housing and jobs development envisaged by the London Plan², and indeed may subsequently work to underachieve the borough’s objectively assessed needs. The Plan has not been prepared positively in a way that is aspirational but deliverable, as required by paragraph 16 of the NPPF. This part of the Plan is therefore unsound.

What legal compliance issue or soundness test(s) does it fail and why?

4. Site allocations enable boroughs to proactively optimise the capacity of strategic sites, and it is therefore important that boroughs plan positively to meet the needs of their communities³. The absence of any site allocations within NSOA doesn’t match its development potential, which derives from its designated growth status, and its provision of sustainably located, large brownfield sites including Friern Bridge Retail Park (FBRP).
5. For growth to be sustainably delivered within intended strategic areas, it does not seem effective for the Plan to allocate sites outside of OA boundaries, prior to existing brownfield sites within OA being assessed as deliverable and developable. For example, site allocation 15 is currently a fully functioning retail site, and despite the fact that it is not within an OA, with a low PTAL, and located within Flood Zones 1, 2, and 3a it has still been promoted for residential, commercial and community uses in preference to the FBRP site. It is also noted that the indicative residential potential for Site 15 is larger than that envisaged for the entire NSOA (by 59%). By comparison, FBRP does fall within an OA, is more sustainably located, and is in Flood Zone 1 only.
6. In addition, the Plan also does not include a detailed strategic policy to guide optimised growth within the NSOA. The omission of either site allocations or a strategic policy renders the plan unsound, as it is

¹ Barnet Draft Local Plan (Reg 19) 2021 to 2036, pp 285

² London Plan Policy SD1, Table 2.1

³ London Plan Policy SD7, paragraph 2.7.6

not positively prepared or effective. This is expanded upon within our Matters 1 and 2 written submissions, and those responses apply equally to this question but are not repeated here.

How could the Plan be made legally compliant or sound?

7. Optimised capacity for sustainable development within NSOA should be properly evaluated, and subsequent strategic guidelines should be developed as part of the Plan to achieve this growth. This is required for the Plan to be in general conformity with the London Plan⁴ and national policy⁵.
8. London Plan Policy SD1 sets an indicative strategic target (i.e. the figure could be higher) for new homes and new jobs within NSOA at 2,500 and 3,000, respectively⁶. Draft Local Policy GSS09 sets a housing target for NSOA at 250, with no targeted increase in new jobs. These are clear discrepancies that represent a significant underestimate of the probable capacity achievable within this OA.
9. The Plan could be made sound by setting a more robust range of estimated housing and employment yields to set the benchmark and context for future development.
10. To achieve this, a strategic policy should be prepared for the NSOA which mirrors the form of Draft Policy GSS02 (Brent Cross Growth Area) for example. This is expanded upon within our Matter 2 written submission, and that response applies equally to this question, but is not repeated here. The policy should utilise more realistic residential and job figures, having regard to the London Plan targets as above.

Precise Change Sought

11. A suggested draft policy for the NSOA is included below:

POLICY GSS0X New Southgate Opportunity Area

The New Southgate Opportunity Area is designated within the London Plan as one of the capital's principal opportunities for accommodating large scale development. The New Southgate Opportunity Area provides an opportunity for regeneration and intensification, supported by high existing PTALs and potential future transport infrastructure improvements, along with the availability of substantial underused sites. The Council will support planning proposals that optimise residential and employment density, including co-location, on suitable sites while delivering improvements to the amenity of the area.

To deliver growth and regeneration at New Southgate, the Council will seek the following from development within the part of the Opportunity Area which lies within LB Barnet:

- ***Up to 1,000*** new homes throughout the Plan period, with the potential to increase further upon delivery of public transit infrastructure improvements;
- ***Up to 1,000*** new jobs throughout the Plan period, across a range of employment uses including distribution and logistics, and retail; and
- ***Appropriate levels of floorspace for community, leisure, and commercial uses.***

⁴ The London Plan, Paragraph 0.0.8

⁵ Paragraphs 124 and 125 of the NPPF

⁶ London Plan Policy SD1, Table 2.1



The Council will seek to prepare a more detailed planning framework for this area, such as through an Area Action Plan or Supplementary Planning Document, working with LB Haringey and LB Enfield to achieve a comprehensive approach.