

Barnet Local Plan Examination

Matter 11 – Site Allocations

Hearing Statement prepared on behalf of Marstead Living Limited September 2022

1. Introduction

- 1.1 This Statement has been prepared by Avison Young on behalf of Marstead Living Limited/IBSA, the owners of the Watchtower House and Kingdom Hall (WTHKH) site in Mill Hill (site allocation ref. 49).
- 1.2 Marstead Living has recently submitted a planning application for the redevelopment of the WTHKH site for 185 homes, comprising 175 x Specialist Older Persons Housing (SOPH) units (use class C2) and 10 x conventional dwellings (use class C3) plus a community facility. The application is pending determination (ref. 22/0649/FUL).
- 1.3 This statement sets out our comments with respect to the issues and questions raised by the Inspectors regarding Matter 11, as relevant to our particular representations.

2. Question 2 – What is the estimated total supply in the Plan period from:

e) Existing or proposed site allocations

- 2.1 Site Ref. 49 includes an indicative figure of 224 homes.
- 2.2 As set out in our Statement with respect to Matter 2 and 10, a full/detailed planning application has subsequently been submitted for 185 homes, comprising 175 x C2 Specialist Older Persons Housing (SOPH) units and 10 x conventional C3 dwellings, plus a community facility, which is pending determination (application ref. 22/0649/FUL). The scheme is the product of extensive joint working with LBB and other stakeholders and we consider it to be the optimum deliverable capacity of the site for the type of specialist housing proposed, having regard to all relevant planning policy considerations.
- 2.3 As is typical for a C2 SOPH scheme, there are extensive communal facilities which are necessary to support the use. These take up approximately 10% of the total amount of floorspace. It would be reasonable to assume that the site would be able to support around 10% more homes if a conventional C3 dwelling scheme was brought forward (perhaps higher depending on the unit size mix), which would be allowed by the site allocation. Accordingly, we consider there to be clear evidence to justify an indicative capacity of at least around 200 homes for the WTHKH site (site ref.49).

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3. **Question 3 – What informed the assumptions about the scale and timing of supply in relation to build-out rates and lead-in times from these various sources? Are these realistic and based upon up-to-date evidence?**

Question 4 – Is the most up-to-date version of the housing trajectory in the Plan realistic? Is there sufficient evidence to demonstrate a sufficient supply of deliverable sites (in years 1 to 5) and developable sites (in years 6 to 15) to ensure that the Plan’s housing requirement for the Borough would be met?

- 3.1 Site Ref. 49 indicates a development timeframe of 6-10 years. A full/detailed planning application has been submitted for redevelopment of the Site which is pending determination (application ref. 22/0649/FUL). The Applicant is also the intended developer/operator of the proposed scheme who is keen to deliver the development as soon as possible. On this basis we consider development could be delivered within year 0-5 rather than 6-10 years.
4. **Question 9 – Is there a sufficient range and choice of sites allocated in the Plan in terms of location, type and size, to provide adequate flexibility to meet the housing requirement for the Borough in the Plan? Would the housing allocations ensure that the Plan would be consistent with the Framework, in so far as it seeks to boost significantly the supply of housing?**
- 4.1 As per our representations to the Regulation 19 consultation, Policy H13 (Specialist Older Person Housing (SOPH)) of the London Plan advocates that Boroughs should identify sites suitable for SOPH. In doing so they should consider local housing need and how well-connected the site is; in terms of contributing to an inclusive neighbourhood, having access to relevant facilities, social infrastructure, health care, and being well served by public transport.
- 4.2 While the Local Plan has not specifically allocated sites for SOPH, the Site ref. 49 is an example of a housing allocation site that would be suitable in locational terms for SOPH as well as conventional housing, as allowed by the site allocation.

Avison Young
6th September 2022.