



Note

LB BARNET LOCAL PLAN EXAMINATION WRITTEN STATEMENT (ID058) - MATTER 11

1 Introduction

- 1.1 This Written Statement has been prepared by Quod on behalf of Hammerson UK Properties plc and abrdrn (“H/abrdrn”) in response to questions raised under Matter 11 “Delivering the identified requirements over the Plan period” within the Inspectors’ Matters, Issues & Questions (“MIQs”) in respect of London Borough of Barnet’s (“LBB”) Draft Local Plan Examination in Public (“EiP”)
- 1.2 H/abrdrn are the long leaseholders of Brent Cross Shopping Centre and surrounding land, and have been working with LBB and key stakeholders over the last two decades to facilitate its revitalisation as part of the wider Brent Cross Growth Area.
- 1.3 Owing to economic uncertainties in the retail market, H/abrdrn took the decision to delay the delivery of Phase 1A (North) and Phase 1B (North) of the 2014 Planning Permission. Although originally hoped that this delay would be temporary, the changes that have occurred are so significant that it calls into question the appropriateness of a retail led development north of the A406.
- 1.4 H/abrdrn remain committed to enhancing the existing Shopping Centre and redeveloping the surrounding land as part of a new Metropolitan Town Centre, and are evaluating the conceptual changes to the retail market and the role of town centres in the context of Brent Cross. H/abrdrn welcome the opportunity to take this work forward in collaboration with the Council, the other development partners and key stakeholders.
- 1.5 For the reasons expressed in response to the relevant questions below and those identified within the Written Statements relating to Matters 2, 4 and 10, H/abrdrn maintain their view that as currently drafted the Draft Local Plan is technically unsound and requires additional modifications as proposed.

2 Response to Questions

- 2.1 This Written Statement is submitted in response to the following Matter 11 Questions:

Matter 11: Delivering the identified requirements over the Plan period

Issue:

Whether the Plan approach towards the identification and supply of land and anticipated delivery of development is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan, so as to ensure the timely delivery of the identified requirements for the Borough?



Note continued

Questions:

The following questions link to the further work requested in the Inspectors' letter of 18 May 2022 to be completed by not later than 23 August 2022, which includes an up-to-date site trajectory for residential, employment, retail and leisure, and any potential updates to Tables 5 and 5A of the Plan. The Council is requested to draw upon and cross refer to that evidence as appropriate when addressing the following questions.

Land for Employment, Retail and Leisure

14) Is there a suitable range and choice of employment locations, town centres and proposed allocations, in terms of type, quality and size, to address the particular characteristics, roles and functions of areas of the Borough and to meet the requirements for employment growth (more than 27,000 new jobs in Policy GSS01) and associated requirements for employment floorspace and main town centre uses in the Plan?

Response to Questions

- 2.2 H/abrdn are supportive of the Council's general approach to development within the Brent Cross Growth Area and Brent Cross North in particular which is a suitable location to meet employment growth and main town centre uses, in addition to a mix of residential homes.
- 2.3 However, as detailed in the Written Statements relating to Matters 2, 4 and 10 H/abrdn do not consider that the inclusion of the retail floorspace figure in Draft Policy BSS01 and on which an element of the 27,000 new jobs identified in Draft Policy GSS01 is predicated is 'justified' or appropriate.
- 2.4 The spatial strategy for the Borough is therefore based on delivering a specific scale of retail floorspace which is not reflective of the current retail market, including H/abrdn's own decision to delay delivery.
- 2.5 As currently drafted, the policy position is unsound and inconsistent with the provisions of the National Planning Policy Framework ("NPPF") 2021 paragraphs 31 and 35.
- 2.6 H/abrdn maintain their suggestion that the specific retail figure is deleted from Draft Policy BSS01 and replaced with wording which supports the creation of a vibrant and sustainable retail, leisure and mixed use Metropolitan Town Centre at Brent Cross North.
- 2.7 In addition, the proposed modification to Draft Policy BSS01 is factually incorrect as the 56,600sqm of additional comparison retail floorspace as approved under the 2014 Planning Permission relates to Brent Cross North not the Growth Area as a whole.
- 2.8 H/abrdn are also of the view that despite clear evidence to the contrary Draft Policy GSS02 and its supporting text continues to focus on retail led growth at Brent Cross North. This is not justified and the text should be amended as proposed as follows:

Brent Cross Shopping Centre will be enhanced and integrated as part of the new Metropolitan Town Centre and will deliver a range of leisure, and other main town centre uses (including



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~~those contributing to the night-time economy) and a mix of residential homes. to ensure that it acts as a regional destination and contributes to a vibrant and viable night-time economy. The shopping centre Brent Cross North will be connected to a new high street to the south via enhanced connections new pedestrian and vehicular bridges over the North Circular. Development at Brent Cross North Shopping Centre is required to deliver measures to increase access to the town centre by means other than the private car. This should be reflective of up to date mode targets.~~