

Barnet Local Plan Examination

Matter 3 – Meeting the Borough’s Housing Needs

Hearing Statement prepared on behalf of Marstead Living Limited

August 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 3, as relevant to our particular representations.

2. Issue 2, Question 2 – Policy HOU01 sets out the specific approach to affordable housing, in that regard:

(a) Is the policy sufficiently clear and in general conformity with the strategic target and approaches set out in Policies H4 and H5 of the London Plan?

- 2.1 We consider that the Council’s proposed modifications to Policy HOU01 (MM115-MM117) are necessary to clarify the application of the London Plan Threshold Approach (at Policy H5) including the Viability Tested Route.
- #### **3. Issue 2, Question 3 – Is the approach in Policy HOU02 in terms of housing mix: positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan?**
- 3.1 There is a soundness issue when Policy HOU02 is read in conjunction with Policy HOU04 with specific respect to proposals for Specialist Older Persons Housing (SOPH).
 - 3.2 As currently drafted, the dwelling size priorities set out in Policy HOU02 apply to all homes, which would include SOPH.
 - 3.3 NPPF para 62 requires the size of housing needed for different groups (including older people) to be assessed and reflected in planning policies. The housing needs (in terms of unit sizes) of older persons are different to those of younger households due to the differences in typical household sizes which are much smaller. Office for National Statistics data confirms that 81% of persons in the UK over the age of 70 live alone and in practice the remainder are most commonly 2 person

households. Accordingly, meeting the housing needs of this group mainly requires the provision of homes with one or two bedrooms (not 2-4 bedrooms as prioritised by Policy HOU02 as currently drafted). Accordingly, the policy as currently drafted (insofar as it applies to SOPH) would not be effective or consistent with national policy.

- 3.4 There are 2 logical mechanisms for resolving this issue, either:
- (a) Policy HOU02 is amended to clarify that the dwelling size priorities do not apply to SOPH; or
 - (b) Policy HOU04 is amended to clarify that the dwelling size priorities set out in Policy HOU02 do not apply to SOPH.
- 3.5 In both scenarios, it would remain appropriate for the policies to retain a requirement for SOPH proposals to provide a mix of dwelling types and sizes that demonstrably address identified local needs for older persons (therefore accounting for the purpose of Policy HOU02).
- 3.6 It is also noted that the AMR does not provide monitoring information specifically relating to SOPH (it is included as part of conventional housing figures). Therefore using the AMR as a mechanism to monitor the delivery of this policy with respect to SOPH would be ineffective.
- 4. Issue 2, Question 5 – Is the approach in Policy HOU04 to specialist housing: positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan. In particular:**
- 4.1 As per our representations to the Regulation 19 consultation, the structure and content of Policy HOU04 is muddled/confusing and, in our view, the Local Plan would be more effective if it contained a standalone policy to manage Specialist Older Persons Housing (SOPH) (as per the approach taken in the London Plan – Policy H13). This would better account for the scale of the need (significance) for this type of housing to meet local housing requirements going forward and allow it to better manage the distinct policy issues that this type of housing presents.
- 4.2 Notwithstanding this, we consider the policy to be in general conformity with the London Plan (in respect to SOPH matters) and when read together with London Plan Policy H13 it provides an adequate policy basis to manage SOPH proposals. This is subject to the following points:
- (1) The issues raised above regarding the interaction of Policy HOU04 with HOU02.
 - (2) London Plan Policy H13 is silent on the use class of SOPH (noting that this type of product can fall within use class C2 or C3). In order to ensure general conformity with the London Plan, we recommend that Policy HOU04 adopts the same approach and therefore references to the use class of SOPH (such as at para 5.10.7 should be deleted).

Avison Young
23rd August 2022.