



MATTER 4: PLANNING FOR THE BOROUGH'S ECONOMY, INCLUDING EMPLOYMENT, RETAIL AND OTHER MAIN TOWN CENTRE USES

General

A minor modification (MM08) proposes to add some text to para. 2.5.1 in relation to Barnet's town centres. The Metropolitan Town Centre at Brent Cross is referred to as a '*future potential Metropolitan Town Centre*.' The Plan has been prepared on the basis that the Town Centre will be delivered and we therefore consider that the word 'potential' should be removed.

Question 9 (a): Whether there is sufficient evidence of the amount of affordable workspace that would be provided and whether it is viable in the locations identified in part a) of Policy ECY02?

We have concerns that the impact of the Plan's affordable workspace policies have not been fully considered. The reasoning is set out in detail in our Regulation 19 response, but in summary, the Local Plan Viability Assessment (Core_Gen_01) only tests the impact of affordable workspace requirements as part of mixed use, residential schemes; no commercial-only scenario is tested. Considering the outer London location of the borough, we would expect the viability of a standalone office development to be significantly more challenging.

The Council has responded that a '*robust assessment*' has been provided. We consider, however, that in the absence of a commercial-only typology within this assessment, part (a) of Policy ECY02 should make it clear that the 10% affordable workspace requirement is subject to scheme viability.

Question 9 (b): How payments in lieu for offsite affordable workspace would be calculated and whether such detail should be included in the Plan?

The Plan includes a formula that will be used to calculate off-site contributions, which multiplies the Gross Internal Area (of the affordable workspace requirement were it to be on-site) by a base build cost rate. The rationale for the formula is unclear and we cannot find anything in the West London Alliance Workspace Study that explains the adoption of this formula. The formula has the potential to require significant financial contributions, particularly in a Brent Cross context. As above, reference to overall scheme viability, taking into account any site-specific obligations that may exist, is required.

Question 9 (f): Whether the proposed modifications to Policy ECY02 in terms of consistency with Policy TOW1 and to include a Cat A requirement are necessary for soundness?

We consider that it is necessary for soundness and welcome this change.

Question 9 (h): Are any other modifications to Policy ECY02 are necessary for soundness?

Part a) of the policy refers simply to 'Brent Cross'. It should be made clear here whether the policy is applying to Brent Cross Growth Area or the *whole* Opportunity Area.

The policy does not set out the level of discount to market rents that the Plan expects the 10% of gross floorspace to be let at by the developer. The Council has responded that the London Plan does not go into this level of detail and that setting the percentage of rental discount is dependent on a number of factors. This position is accepted, but we request that some commentary to this effect is set out in the Plan's supporting text.