



Barnet Draft Local Plan
Publication Stage Representations Form

Ref:

(For official use only)

PART B - Your representation

Please complete a separate Part B for each representation and return along with a single completed Part A.

Question 1: To which part of the Local Plan does your representation relate?

Representations must be made on a specific policy or part of the Plan, please state the policy number, paragraph number, figure/table or Policies Map designation.

Policy BSS01, GSS01, HOU02

Policies Map designation N/A

Question 2: Do you consider that this part of the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

- | | | |
|--|---|--|
| a) Legally compliant | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| b) Sound | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| c) Compliant with the Duty to Co-operate | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound, or fails to comply with the duty to co-operate.

Please be as precise as possible. If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see attached written representations.

Continue on a separate sheet if necessary

Question 4: Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect to the matters you have identified in Question 3 above. *Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

Please see attached representations.

Continue on a separate sheet if necessary

Please note:

In your representation you should summarise succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

Question 5: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing sessions?

Yes, I wish to participate in hearing session(s)

No, I do not wish to participate in hearing session(s) /

I am not seeking modification to the Plan

Question 6: If you wish to participate at the examination hearings, please outline why you consider this to be necessary.

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.

Please see attached representations.

Declaration of consent

The personal information you provide on this form will be processed in accordance with General Data Protection Regulations 2018 (GDPR). The information you provide will only be used for the purposes of the preparation of the Local Plan as required by the Planning and Compulsory Purchase Act 2004 (as amended), and may be used by the Council to contact you if necessary, regarding your submission. Your name, name of organisation, and comments, will be made available for public inspection when displaying and reporting the outcome of the statutory consultation stage and cannot be treated as confidential. You will not be asked for any unnecessary information and we will not publish any personal data beyond what is stated in this declaration.

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Signature



Date: 09/08/2021



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London Borough of Barnet
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09 August 2021

SH/JS – 19/077
BY EMAIL

Dear Sir/Madam,

REPRESENTATIONS TO THE BARNET DRAFT LOCAL PLAN (REGULATION 19) PREFERRED APPROACH CONSULTATION – RECTORY FARM, CAMLET WAY, MONKEN HADLEY EN5 0NJ

Iceni Projects Ltd is instructed by the London Diocese Fund ('the Diocese') to make representations to the London Borough of Barnet ('the Council') in response to the Draft Local Plan (Reg 19). These representations relate to the land known as Rectory Farm, located in Monken Hadley, which we consider has significant potential for either residential or educational development.

a. Executive Summary

Barnet are preparing a Local Plan which sets out a vision for how Barnet will develop as a place over the next 15 years. The key points to extract from these representations are as follows:

- The Council should plan for a higher level of housing need based on the Standardised Method;
- Releasing Green Belt sites will be a necessity to meet housing need in the area, including aiding the delivery of family sized homes and important infrastructure such as schools.
- Rectory Farm is a deliverable and available site which is suitable to accommodate an extension to the existing Mount House School and deliver much needed housing to meet the Council's short-term needs whereby the majority of growth is reliant on strategic sites.
- The Diocese are in discussion with Mount House School to provide part of the site for a sports facility. The school has confirmed they will support community access to the facilities for which there is a large shortfall in the Borough.

b. Site and Surroundings

The site is located to the north east of Barnet, adjacent to Mount House Independent School, situated to the north of Camlet Way, Monken Hadley. The site is currently designated as Green Belt in Barnet's Local Development Framework.

The site benefits from being in an accessible location. Hadley Wood train station is a 15-minute walk from the site, with trains running directly to both London Moorgate and Welwyn Garden City every 10 minutes. Camlet Way Bus Stop (immediately in front of the site) is served by bus route 399 and Broadgates Avenue bus which has several other regular bus services is within close proximity. Monken Hadley/Chipping Barnet town centre is approximately 0.9 miles or a 17-minute walk, close to various existing shops and services.

The site comprises an area of hardstanding car parking space along with a number of semi-obsolete buildings which were used as garage for classic cars.

Mount House operates successfully, therefore this location is considered appropriate for this use. The site is also in close proximity to Monken Hadley C of E Primary School. A site plan can be found at **Appendix A1**.

c. Site History

Planning History

An application was submitted on the south west of the site for the erection of two single storey buildings and associated hardstanding for use in association with existing riding school/ livery stables following demolition of existing farm buildings (Ref: B/04272/20). Permission was granted in 2011. This was not implemented, but demonstrates the suitability of the site for additional built form.

In 2019, an application (19/0957/FUL) was approved in 2019 for a two storey expansion block on Mount House School. This application highlights the School's intention to expand from its current capacity of 160 pupils up to 300.

In June 2021 an application (21/1869/FUL) was approved for the replacement of the existing ball games area with 2 no new multi-use game areas and associated fencing at Mount House School. This further supports the School's intention to expand.

Previous Site Promotion

The Diocese has previously promoted the site through both the Call for Sites (2017) and the Growth Strategy (2019). In addition to this, representations to the Special Educational Places Plan Consultation Document stating that the site would be available to provide a temporary facility for the Windmill Free School before its opening in 2023 or 2024.

Representations were also submitted to promote the plan during the Draft Local Plan (Reg 18) Preferred Approach Consultation. The representations promoted the suitability of the site for further education provision and for housing.

d. Development potential of the site

Education Provision

Mount House School is a highly successful independent school which provides additional educational choice to the residents of the Borough. It has aspirations to expand their existing facilities and we consider the adjoining Diocese land provides an ideal opportunity to achieve this. The provision of additional sporting facilities is a key aim of the school and these could be made available to the local community and help meet some of the shortfalls in leisure facilities identified in the Council's Indoor Sports and Recreation Facilities Study.

For example, the School aspires to deliver a new sports hall which is also identified as a requirement within the Indoor Sports and Recreation Facilities Study. By removing the site from the Green Belt and allocating it for these purposes the Council could meet its twin objectives of enhancing its educational offer to parents and increasing community access to leisure and recreation facilities for which there is a shortfall.

Residential Development

In addition to educational provision and leisure facilities on site, we consider that the wider site is suitable for delivering much needed family housing. The site is in a broadly sustainable location; does

not contribute towards the five aims of the Green Belt set out within the National Planning Policy Framework (NPPF) and is located within an area of compatible land uses.

As a minimum, a degree of cross-subsidy will be required to deliver the expanded education and leisure facilities at Manor House School. This would be delivered by residential development on the site which, as we have set out above, would be an appropriate and suitable location for new housing.

The following sections set out our justification in relation to the relevant policies and evidence base documents.

e. Planning Policy Context

The Government's national planning policies are set out in the NPPF published in July 2018 with subsequent revisions, the most recent published in July 2021. It contains the Government's policies for planning in England and should therefore be considered within these representations.

Plan Making

Paragraph 35 of the NPPF confirms that, to be sound, a plan must be:

- *Positively prepared* - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- *Justified* – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- *Effective* – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- *Consistent with national policy* – enabling the delivery of sustainable development in accordance with the policies in this Framework.

Sustainable Development

Paragraph 8 identifies that achieving sustainable development means that the planning system has three overarching objectives, all of which should be considered to be interdependent and therefore need to be pursued in mutually-supportive ways:

- An economic role;
- A social role; and
- An environmental role

Paragraph 11 states at the heart of the NPPF is a presumption in favour of sustainable development. For plan-making this means that;

- Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; and
- Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.

Green Belt

Section 13 of the NPPF outlines policy relating to the Green Belt. Paragraph 137 introduces the Green Belt, stating that the fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open. Paragraph 137 also states that the essential characteristics of the Green Belt is their openness and their permanence.

Paragraph 138 sets out the five purposes of the Green Belt, which are as follows;

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Paragraph 140 states that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. Furthermore, strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure the Plan period.

Paragraph 142 states that when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account, with Paragraph 143 stating that when defining Green Belt boundaries, plans should ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development; be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the Plan period; and define the boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

Education

Paragraph 95 of the NPPF provides highly relevant guidance on how the approach to school expansion. It states that:

- It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education.

It continues that local authorities should:

- Place great weight on the need to create, expand or alter schools through the preparation of plans.

The NPPF makes no distinction between expanding choice for state and independent school and the delivery of sufficient places should be treated equally in the plan making process.

f. Responding to the Regulation 19 Draft Local Plan

The following section responds to the Regulation 19 consultation documents which are as follows:

- Draft Local Plan (Reg 19) Full Document; and
- Evidence and supporting documents

POLICY BSS01 Spatial Strategy for Barnet

The policy states that between 2021 and 2036 the Plan seeks to deliver a minimum of 35,460 new homes. This is based on the London Plan (March 2021) Market Assessment. A number which is a significant reduction from the previous delivery number of 46,000 based on the Barnet SHMA (Oct 2018).

The Standard Method formula, which addresses projected household growth and historic under-supply, identifies a minimum requirement of 5,361 dwellings per annum for Barnet. This equates to 80,415 dwellings across the plan period. This is significantly higher than the figure provided for in the Draft Local Plan. Furthermore, Barnet's SHMA identifies the Full Objectively Assessed Need (OAN) for housing in Barnet as 3,060 dwellings per year. This equates to a need of 46,000 new homes over the lifetime of the Local Plan. Again, this is significantly higher than the number provided for in the Draft Plan.

While it is acknowledged that the London Plan has set a lower housing target for the Borough, there is a clear imperative to maximise the Council's housing target and explore the potential for meeting a higher housing target. The Draft Plan proposed to meet the London Plan target of 35,460 new homes while providing a supply of sites for up to 46,000 new homes. The Council will seek support to boost delivery from the Government and Homes England, as well as the Greater London Authority, through funding streams such as the Home Building Fund and Good Growth Fund.

We consider that there is clear justification to deliver above the level of housing envisaged in the London Plan. First, the approach set out in the Local Plan will deliver high density housing within the settlement boundary, the overwhelming form of housing provided would be flats. While there is a significant need for this form of housing in London, there is also a very large need for housing, particularly in an Outer London Borough such as Barnet where families seek larger homes.

This is compounded by the effects of the pandemic with a much greater demand for houses which provide more space. The effects on the housing market in Outer London Boroughs are already demonstrating this need. We consider that Barnet need to seek to ensure that they are able to deliver a variety of housing needs, rather than solely concentrate on flatted development.

Furthermore, the New London Plan targets are minimum targets and that cover the period for 2019/20-2028/29. As the Barnet Draft Local Plan covers the period 2021-2036, the housing requirement should reflect this and identify a requirement which includes anticipated needs beyond 2028/29. Barnet should be looking to deliver more than its requirement in order to support the Government's objective to significantly boost the supply of housing (NPPF, paragraph 60).

Second, the current approach to meeting the London Plan target fails to capitalise on the opportunity of delivering higher levels of affordable housing. The current target does not adequately address affordable housing need, particularly around social rented housing. Increasing the Local Plan target would allow the Council to meet this wider need and address this unmet need.

Such an approach is likely to require the release of Green Belt land, but we consider that this is justified. Barnet is no different from any other local authority with significant levels of housing need who cannot meet it within the built-up settlement boundary. There is a clear and well-defined approach as defined by the Calverton High Court Judgement, this states that the following procedure should be followed:

1. The acuteness/intensity of the housing need should be assessed.
2. the constraints on the supply/availability of land suitable for development should be understood.

3. The difficulties in achieving sustainability without impinging on the Green Belt should be reviewed;
4. If the Council cannot accommodate growth outside of the Green Belt then potential for exporting that need to neighbouring authorities should be tested;
5. If none of the above steps can avoid delivering housing in the Green Belt then the nature and extent of the harm to this green belt should then be assessed against how far the impacts on green belt purposes could be reduced when delivering housing on Green Belt sites.

In our view, the above steps could be followed to support the release of Green Belt land in the Borough.

In summary, we consider that this housing figure is not representative of Barnet's actual identified need. The Council should be assessing the potential of the Green Belt to accommodate growth in order to seek to deliver higher levels of growth to address unmet need.

POLICY GSS01 Delivering Sustainable Growth

The Council's current approach to delivering this growth focuses on regenerating and developing areas of brownfield and underused land. The Council are therefore proposing all allocations to be outside the Green Belt or within the built-up settlement area, for example seeking to deliver 23,300 homes in 6 Growth Areas across the Borough.

While we generally support this approach as a starting point, in its current form it will not ensure that enough housing is delivered in Barnet. As will be explored throughout, releasing Green Belt land will be necessary to; meet housing needs; deliver necessary infrastructure such as schools; and increase affordability while maximising development on brownfield land within the built-up settlement area.

Brent Cross in Barnet's largest growth area. Included in this, is a large and complex scheme, taking over 20 years to deliver 7,900 homes. The outline planning permission, approved in 2010, is now over a decade old. While it has flexibility to allow the phasing and delivery sequence of the development to be adjusted, it is expected that it will need to be supplemented through further planning applications to update areas of the masterplan as it evolves and as the development responds to updated market and policy shifts, particularly those arriving from the pandemic.

The Government's Housing Delivery Test (HDT) provides a measure of housing delivery based on the preceding three financial years. The Housing Delivery Test concluded that Barnet's housing delivery is below 95% and the Council was therefore required to produce this Housing Delivery Action Plan (HDAP).

While the HDAP highlights measures that Barnet is taking to improve levels of housing delivery, it demonstrates that the majority of homes are coming forward within large schemes (150+ homes). This high dependence on larger sites results in a potential risk to overall future delivery, given the broad reliance on meeting a significant proportion of the target for new homes through a small number of very large schemes. For these schemes, experience shows that they can often have more complex issues that require resolving, and these can therefore have the potential for significant delays.

Furthermore, the HDAP focuses on the 2019/20 financial year i.e. the period before the COVID 19 lockdown. The impact of the lockdown on housing delivery is a national issue. Local Plans will need to ensure that their housing need is robust enough to withstand the impact on potential delays to housing delivery caused by the Covid 19 lockdown.

This further supports the argument that the Council will need to increase their delivery and build a buffer rather than expecting these sites to come forward as planned. We consider that Green Belt sites

can be brought forward quickly and help meet need in the early part of the Plan Period without the need to rely upon new infrastructure. Furthermore, the variety of housing types brought about by delivering more houses, would protect the Council from housing delivery issues.

Smaller Sites

The Council state that a significant additional element of housing growth will come forward on small sites which are not yet formally identified (5,100 homes) based on previous trends. The NPPF states that where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.

We support the view that a variety of sites will need to come forward and play a role in housing delivery. However, the Council fail to justify this figure. This figure appears to be arbitrarily set and therefore cannot be considered a reliable source of realistic housing delivery.

This is further supported by the London Plan Examiner's Report which did highlight the uncertainty of the delivery of small sites.

We consider that the Council should focus on the delivery of appropriate sites in the Green Belt which can be identified and brought forward quickly to ensure that there is a varied and realistic level of sites which can come forward to provide housing throughout the district.

Policy HOU02 Housing Mix

In general, one and two bedroom dwellings are the most dominant type of accommodation delivered in Barnet, accounting for 78% of all new homes overall and 86% of flats. The Council has identified a particular need for 2, 3 and 4 bedroom properties across all tenures and there is a significant need for family sized housing to be provided as part of any market housing mix. Green Belt sites are often better suited to deliver family homes which is further reinforced by the character of the surrounding area of the site. The Council's current strategy will deliver a surfeit of flatted accommodation which will not meet the needs of the Borough.

g. Supporting Documents

Selection Background Document

Barnet have published a site Selection Background Document which outlines the methodology that the Council have adopted to assess what sites are suitable, available and achievable for housing. Sites with certain planning policy designations were considered to be incompatible with the designation of potential development sites; primarily Green Belt and Metropolitan Open Land.

The site was therefore rejected on the basis that it is Green Belt alone and was not taken forward as part of the more detailed assessments. To be considered deliverable sites for housing, they should be immediately available in a suitable location for development and achievable with a realistic prospect that housing will be delivered on the site within five years. Aside from being situated the Green Belt, the site meets the tests which make it deliverable.

We do not consider this approach to be sound as the Green Belt is not an environmental policy that makes all sites unsuitable. The Green Belt is a spatial policy which should not be used to deem sites unsuitable on this basis alone. This decision is a Borough-wide one which should be made in the context of deciding whether Exceptional Circumstances exist (which has not properly taken place within the established parameters of the Calverton judgement).

Green Belt Study

The have carried out a Stage 1 Green Belt Assessment as part of the Local Plan preparation. The site was assessed as having a strong contribution to 4 purposes of the Green Belt and a relatively weak contribution to purpose 2.

Firstly, we do not consider the Stage 1 Green Belt Assessment to be an appropriate basis for determining which sites to remove from the Green Belt. The broad assessment of the Green Belt fails to fully assess refined sites. Furthermore, this Sevenoaks Local Plan was recently declared unsound and the Inspector was heavily critical of their approach which was similar to Barnet's approach.

We have included our assessment of the site to demonstrate that the site does not fundamentally contribute to the five aims of the Green Belt as outlined within Paragraph 138 of the NPPF. We consider that both housing and educational needs demonstrate exceptional circumstances sufficient to justify Green Belt release. We urge the Council to follow the examples of Enfield and Hounslow in exploring the potential of the Green Belt to meet housing requirements.

Purpose	LUC's Assessment	Our Assessment
Purpose 1 Assessment – to check the unrestricted sprawl of large built up areas	Strong	The site is boarded to the south and east by Mount House School and residential development situated in the Green Belt.
Purpose 2 – To prevent neighbouring towns from merging into one another	Relatively weak	The site forms part of an existing built up development and does not extend in to open countryside. Development of this site would extend to the north, therefore not contributing to the merging of neighbouring towns.
Purpose 3 - To assist in safeguarding the countryside from encroachment	Strong	The site contains an area of dense mature trees to the south west with Mount House School situated on the southern boundary of the site which contains the site the south. There are a number of non-green belt uses to the north east which the site does not contribute towards safeguarding.
Purpose 4 – to preserve the setting and special character of historic towns	Strong	The site is located in a Conservation Area, however any proposals for the site will respect and enhance the existing settling of the surrounding area. In any case, the main objective of this purpose is to protect the Green Belt setting of historic towns and cities such as Oxford or York where there is an intrinsic link between Green Belt and setting of the city, this does not apply to London in the same way.
Purpose 5 - to assist in urban regeneration by encouraging the	Strong	Development would not preclude the recycling of derelict and other urban land elsewhere in Barnet.

recycling of derelict or other urban land		
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Given the above conclusions we consider that the site should be considered for release from the Green Belt in order to meet the overwhelming housing and sport and recreational needs in the Borough.

h. The suitability of the site for education

A key priority of the Council's Growth Strategy is to deliver social infrastructure to support growth through ensuring that schools and leisure, health and community facilities are delivered to support areas of growth and regeneration. By 2036, the borough will see a 5% increase in the number of young people aged 0-19.

The Council are seeking for the majority of schools to come forward within the Growth Areas, therefore it is likely they will take longer to be delivered. Further to this, there is no clear Infrastructure Plan which demonstrates how needs for schools will be met in the Local Plan. The council need to seek a more proactive approach to delivering this and extending Mount House School provides a short-term opportunity to meet educational and recreational needs in the Borough.

Greenfield sites in particular can provide larger school grounds with a greater range of recreational facilities on site, which aren't available at other schools in the area, which makes this site more attractive when deciding where to focus development through the emerging Local Plan.

Recently, both the Department for Education (Securing Developer Contributions for Education) and CLG (revisions to Planning Practice Guidance) have published guidance on collecting developer contributions to fund new school places. This is part of a significant shift of emphasis away from Central Government funding the bulk of new school places towards a situation whereby developers will be expected to deliver them, where it is directly arising from new housing growth.

Up until now, the Free School Programme has been heavily funding the delivery of new schools, with 442 schools open and a further 262 in the process of opening since 2010. The Free School Programme now appears to be decelerating and in the future it is expected to be smaller and focused on assisting with Government objectives of improving social mobility. This does not mean that England does not need more schools; housing targets in new Local Plans will create a need for new schools - but as this need is perpetual Central Government will increasingly expect developers to pay for it.

This policy change will also have wider ranging implications for both local authorities and developers when identifying new sites. Local authorities will need to be robust when identifying where schools will be located and the level of growth they will need to meet. The feasibility of new schools will require proper testing at Local Plan stage as Central Government will no longer provide a fallback position to deliver schools on a windfall basis.

In order to determine how to deliver sufficient school places in the Borough for state and independent schools, the Council should set out a clear plan on how and where they intend to address this emerging need. This is required by NPPF paragraph 95 which requires that local authorities take a proactive approach in their Local Plan to expand choice for school places.

Given that new residential development is identified in built up area, the ability to deliver schools on these sites will be limited and Green Belt sites will be required to ensure that enough school places can be delivered within the relevant timescales.

Failure to do so could leave Barnet in a position whereby they cannot deliver sufficient school places as they do not have sufficient land or funding. This will make the Local Plan unsound on the basis that it is not justified or based on robust evidence. To rectify this the Council should look to identify sites for school expansion, including the necessary facilities. We consider our site at Moken Hadley can deliver just such infrastructure.

i. Indoor Sports and Recreation Facilities

We do not consider that the Council's approach to delivering supporting recreational facilities is sound and thus the Local Plan fails the tests of soundness due to it not being based on a robust evidence base. The Council has produced an Indoor Sports and Recreation Facilities Study which provides an assessment of the needs for a range of indoor sports facilities in the Borough. The Strategy is intended to guide future provision of indoor sports facilities to serve existing and future residents in the Borough, but no clear strategy for delivery of this is found within the Local Plan.

This states that although the Borough has good sports facilities, there are some ageing facilities which will require replacement/ refurbishment in the plan period. Based on the quality audits and assessments, supply and demand, and the needs analysis, the priorities for future investment in facility provision are:

Sports Halls

- Increased community access to existing sports hall facilities;
- Secured access for community use incorporated as part of planning conditions;
- Long term replacement / refurbishment of ageing facilities.

Gymnastics and Trampolining

- Potential to explore further provision given high numbers on waiting lists;

The Council place an emphasis on both increasing community access to existing facilities and the replacement of ageing facilities, although in the absence of an Infrastructure Delivery Plan it's not clear how these facilities will be funded and thus when they will be delivered. Rectory Farm provides an opportunity to deliver new and well-designed sports facilities in the short-term as part of a wider expansion of Mount House School whilst delivering much needed family housing. The Diocese are in discussion with the school to provide part of the site for a sports centre and they have confirmed support for community use.

j. Conclusion

These representations are produced on behalf of the Diocese of London and seek to demonstrate how the release of the site can assist the London Borough of Barnet in achieving one of its key principles of increasing housing supply and key objective of delivering social infrastructure to support this growth. This can be delivered through a mixed use cross-subsidy approach as highlighted earlier in this document.

We consider that the site is a broadly sustainable option for the delivery of housing and educational facilities and therefore the Council should consider its release from the Green Belt through this Local Plan cycle. In comparison to brownfield sites, Green Belt sites are considered deliverable in the short term, rarely have problems with contamination, can provide infrastructure on site if needed, and can also provide high quality, landscaped environments.

The Council should therefore strongly consider releasing this area of land to accommodate these uses throughout the plan period, whereby the LDF's landholding is suitable, available and achievable.

Thank you for the opportunity to respond to the Draft Local Plan Consultation. We would welcome the opportunity to discuss the site in more detail with the local authority. Should you have any further questions, please contact me on DD: 020 3725 3856 Mob: 07885637342 or email me on sheritage@iceniprojects.com.

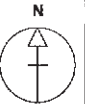
Kind regards,

Sophie Heritage
SENIOR PLANNER

APPENDIX A1 – SITE PLAN



TITLE NUMBER
AGL158658



BARNET

ORDNANCE SURVEY MAP REFERENCE:

TQ2997NW

SCALE 1:2500

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