



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 _____ Paragraph _____ Figure/Table _____

Policies Map designation _____ Please see supporting information

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 type="checkbox"/> | No <input checked="" 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 accompanying letter.

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 accompanying letter.

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.

Land interest

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.

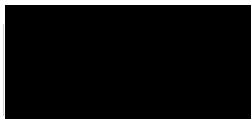
Your details will be kept in accordance with the Council's Privacy Notice, until the Local Plan is adopted plus a further five years to evidence that a fair and transparent process has been followed. Processing is kept to a minimum and data will only be processed in accordance with the law. We will take all reasonable precautions to protect your personal data from accidental or deliberate loss or unauthorised disclosure.

The Council's Privacy Notice can be viewed at <https://www.barnet.gov.uk/your-council/policies-plans-and-performance/privacy-notices>

The legal basis which enables the Council to process your data for this purpose is consent from the data subject (you) under Article 6, paragraph (a) of the GDPR. Information provided will be stored in accordance with the Council's retention and disposal guidelines.

By completing and signing this form I agree to my name, name of organisation, and representations being made available for public inspection on the internet, and that my data will be held and processed as detailed above, in accordance with the Council's Privacy Notice:

Signature



Date __9th August 2021



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Our Ref: 21/263

9th August 2021

Dear Sir/ Madam,

LAND TO THE SOUTHEAST OF BARNET GATE, BARNET

WRITTEN REPRESENTATIONS ON THE DRAFT REGULATION 19 (PUBLICATION) LOCAL PLAN

Iceni Projects Ltd have been instructed by Mactaggart & Mickel Homes Limited to prepare representations on the London Borough of Barnet Draft Regulation 19 (Publication) Local Plan.

Soda Holdings Limited is the registered owner of the land to the southeast of Barnet Gate, Barnet. Mactaggart & Mickel are making these representations with a view to developing the land to the south-east of Barnet Gate to deliver a family-led housing scheme. The scheme will comprise of approximately 500 homes that will embrace the latest forms of environmental technology to combat climate change. The new homes will be offer generous amounts of open space; provide modern infrastructure for home-working and provide access to a range of wider services and facilities in Barnet, Edgware and Borehamwood. The emphasis will be on beauty, placemaking and positively responding to the local area.

A site location plan is attached at **Appendix A1**.

a. About Mactaggart and Mickel

Mactaggart & Mickel was founded in 1925 in Scotland. They are a fifth-generation family company, with family values and long-term goals. In 2021, Mactaggart & Mickel received a prestigious Five Star rating for customer satisfaction from the Home Builders Federation (HBF).

As well as shaping new communities in Scotland, Mactaggart & Mickel has more recently shaped projects in Oxfordshire and London and has several projects in North America (Chelsea in Manhattan and Williamsburg in Brooklyn). In 2020, Mactaggart & Mickel opened a London-based division, demonstrating their commitment to projects in the south-east and south-west of England.

Mactaggart & Mickel is a leading house-builder and a resilient company that has strong and diversified foundations. Its governance structure allows it take entrepreneurial decisions and to break the status quo. They have an enthusiasm to implement new sustainable technologies, reduce the dependence on the private motor car and encourage new start-up entrepreneurial businesses.

Mactaggart & Mickel are committed to supporting the London Borough of Barnet through the plan-making process. The professional team will work alongside both officers and elected Members at the

London Borough of Barnet to create a place that reflects local design policies and provides a shared sense of pride and commitment to longevity.

b. Context

The NPPF (20 July 2021) sets out four tests that must be met for Local Plans to be considered sound at Examination. In this regard, we submit that in order to prepare a sound plan it is fundamental that the emerging Local Plan is:

- **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 and other statements of national planning policy, where relevant.

c. Housing Requirement

The Council should be proactively supporting sustainable development to deliver a significant boost to the supply of housing to meet identified housing needs as set out in the NPPF.

In delivering this, the National Planning Policy Framework expects strategic policy-making authorities to follow the standard method within the National Planning Policy Guidance for assessing local housing need, unless exceptional circumstances justify an alternative approach. The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply.

As confirmed in Paragraph 4.4.2 of the *Barnet Draft Local Plan (Reg 19) 2021 to 2036* the most up-to-date standardised methodology confirms a requirement for a minimum of 5,361 homes per annum (or 80,415 homes in total). This is stark contrast to that proposed by the Council at 2,364 homes per annum (or 35,460 homes in total). This is a 56% shortfall year-after-year.

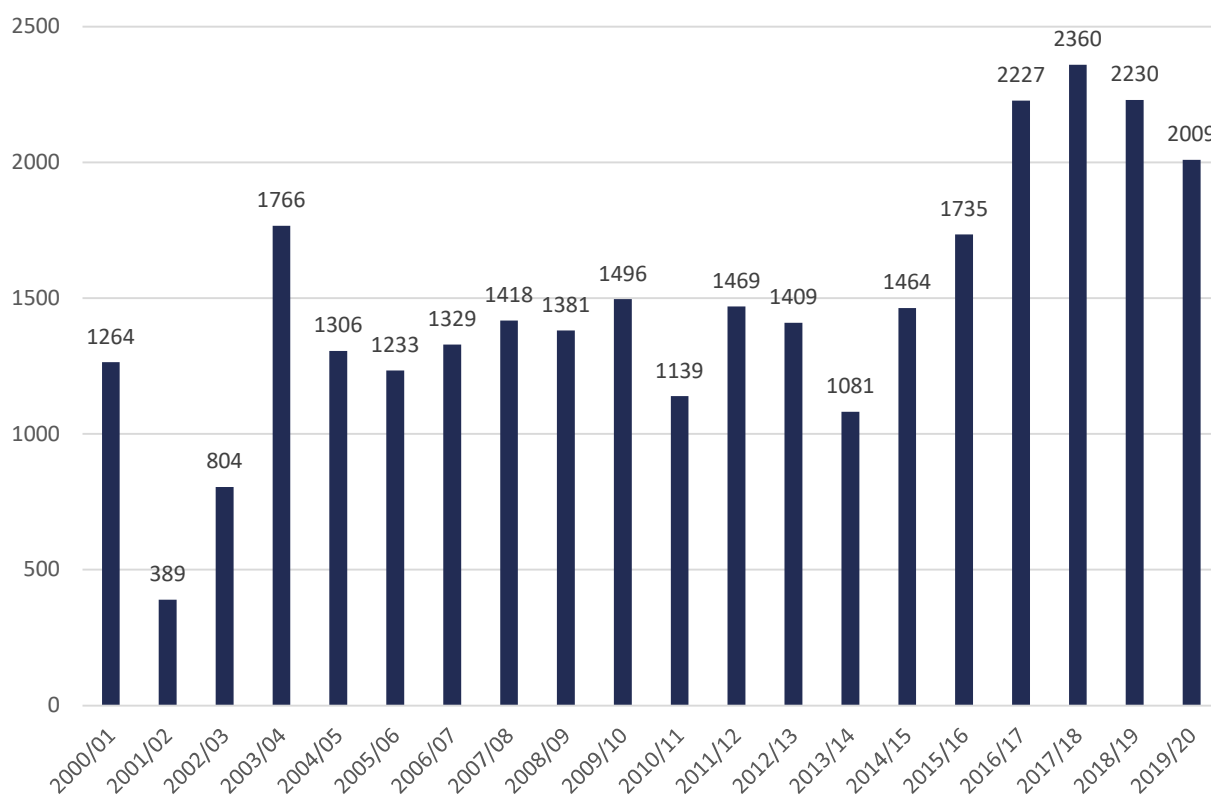
Given the London Borough of Barnet are proposing a lower housing need figure than that identified using the standard method, the Local Planning Authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. Mactaggart & Mickel do not consider that exceptional circumstances do apply. Conversely, the London Borough of Barnet is positioned in Greater London; it has a high level of existing and planned infrastructure (the West London Orbital; Brent Cross West Station, and the potential for Cross Rail 2); has a high proportion of brownfield sites available and has significant pressures for affordable homes.

It should also be noted that the London Plan is only able to establish housing requirements for 10 years from the period 2019 / 2020 – 2028/2029. After this point, the land supply position is uncertain. It is anticipated that a new London Plan will be adopted before the end of this period and will establish a new housing need / requirement. As such, the emerging Barnet Local Plan should make this clear.

Mactaggart & Mickel believe that not only is the London Borough of Barnet not planning to meet its housing needs in full, but also has also underdelivered for the last 20 years. Historical housing completions are shown at Figure 1 (overleaf). It provides information from 2000 / 2001 and 2019 /

2020 and confirms that the average rate of delivery has been only 1,348 homes, which based on the current standard method requires a step-change of almost 300%.

Figure 1 – Historical Housing Delivery in the London Borough of Barnet



d. Housing Choice

COVID-19

The COVID19 pandemic has prompted changes in our preferences to living. People are now spending longer at home due to amended working practices. For example, TUI are advising staff to spend just one day in the office per month going forwards. Similarly, companies such as PwC, Lloyds Banking Group, Virgin Media and Centrica are all openly moving towards a hybrid way of working. The direct implication of this is people are reconsidering where they live. Unsurprisingly, the desire for more space and the declining importance of an easy commute are key determinants. What this means in terms of housing mix is people are increasingly looking for an extra bedroom as a workspace environment and outdoor space.

Emerging Local Plan

This is particularly relevant in the context of Paragraph 5.5.10 of the *Barnet Draft Local Plan (Reg 19) 2021 to 2036*. This confirms that housing trends in Barnet are at variance with the wider London requirement insofar as it relates to housing mix. The Mayor’s Strategic Housing Market Assessment (SHMA) 2017 highlights that one bedroomed units are the largest requirement for market as well as social rented housing in London. This contrasts with the findings of Barnet’s SHMA published in 2018, which confirms a requirement for family housing. The largest market housing requirement in the London Borough of Barnet is for 3-bedroom homes and, thereafter, for 4-bedroom properties. This is summarised overleaf.

Figure 2 – Required Market Housing in Barnet (extract from Local Plan)

Unit Size	Market Housing
1-bedroom	6%
2-bedroom	24%
3-bedroom	40%
4-bedroom	25%
5-bedroom	5%

The Council has identified a number of strategic regeneration projects within its emerging Local Plan. This includes the Brent Cross Opportunity Area, which has been identified for the delivery of 7,500 homes and supporting employment over the plan period. The first phases of housing delivery have already been consented and construction has now commenced. These are providing approximately 33% 1-bedroom flats / studio / 57% 2-bedroom flats and 10% 3 / 4-bedroom flats (Ref. 17/6662/RMA). This housing mix does not align with that identified in the emerging Local Plan.

In addition to the above, the Council are proposing 5,400 homes in town centre locations / 1,650 homes on new transport hubs / 1,400 homes in Cricklewood town centre and 3,350 along major road corridors. The emerging Local Plan policies also support the delivery of 8 to 14 storey buildings in these locations. As such, these growth areas are likely to have a strong emphasis towards high-density flat-led residential typologies. By contrast, the only area where sub-urban growth is identified is in Mill Hill East, which is projected to deliver 1,500 homes.

This heavy dependence upon high-density apartment living does not align with the overarching vision of the emerging Local Plan (as set out in Paragraph 3.1.1), which is to “be a place that is family friendly”; “a place where people choose to make their home”, and a place with a “range of housing types”. Paragraph 6.2.2 sets a bold target of being “the most family friendly place in London” but it is unclear how this strategic objective will be delivered.

As a note of caution and as confirmed in the emerging Local Plan, “New one bed homes that meet London Plan space standards contribute to address needs in numerical terms; however, they are amongst the least flexible forms of accommodation in allowing for changes to individual housing needs and circumstances over time” (Paragraph 5.5.7). This again emphasises the importance of balance, rather than placing an over-reliance on smaller properties.

Authority Monitoring Report

The Authority Monitoring Report (previously known as an Annual Monitoring Report) is published each year reporting on the performance of the council’s Planning policies. The most recent available on the Council website is for the period 2019 / 2020.

The AMR is helpful insofar as it clearly sets out the long-term delivery mix that has been completed during 2011 / 2012 – 2019 / 2020. Again, this shows a strong bias towards smaller properties over the last decade.

Figure 3 – Housing Mix [2011 / 2012 – 2019 / 2020]

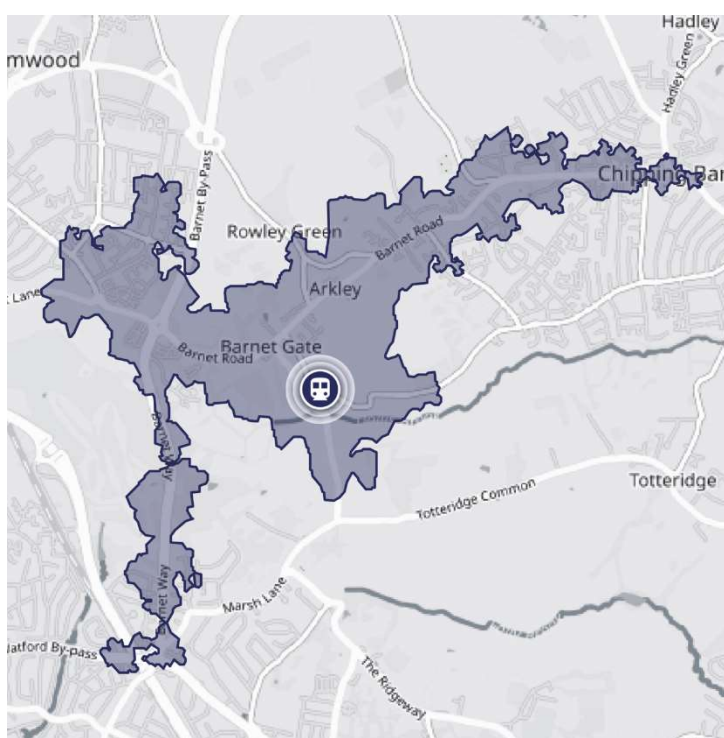
Unit Type	Number of Bedrooms				
	1 / studio	2	3	4	5
Total Number of Units	40%	26%	16%	9%	9%

e. Sustainably Positioned

The NPPF has been updated to place renewed importance on placemaking and beauty. Mactaggart & Mickel recognise that this goes far beyond individual house type design. Places should be underpinned by sustainable growth with positive development outcomes. Moreover, they should lead to healthier lifestyles, cohesive neighbourhoods and the creation of buildings that have minimal negative impact on the environment.

The below plan shows a 15-minute public transport isochrone from the site. This provides access to a range of service and facilities in the area, including: Barnet Hospital, Saffron Green Primary School; Northway School; Courtland School and a large Morrisons Supermarket.

Figure 4 – 15 mins Isochrone from the Site



f. Conclusion

The emerging Local Plan is framed in the context of a pre COVID-19 environment. It seeks to respond to the demise of traditional retail and the changing landscape of town centres. It promotes high-density apartment-led living in areas with a strong public transport network. Whilst there is obvious role for this form of development the emerging Local Plan does need to provide balance within its strategic policies.

In accordance with national policy, the emerging Local Plan should respond to needs over the plan period. And, for the Local Plan to be found sound under the four tests of soundness as defined by the NPPF the Local Plan must be positively prepared, justified, effective and compliant with national policy.

We encourage the Council to consider the importance of land to the south-east of Barnet Gate as having the potential to bring forward a sustainable urban extension which incorporates traditional family housing with cutting-edge digital and sustainability components. Mactaggart and Mickel would like to work collaboratively with the Council and other stakeholders to ensure an ambitious plan is delivered for the residents, business and visitors of the London Borough of Barnet.

Thank you for the opportunity to respond to the Regulation 19 (Publication) Local Plan consultation. We would be grateful for confirmation of the receipt of these representations and would welcome the

opportunity to discuss the site and the contribution it can make to sustainable development of the Borough.

Yours sincerely,



James Bompas MBA MRTPI
Director

Appendix 1 – Site Location Plan

