



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 _____ GSS01 _____ Paragraph _____ Figure/Table _____ Table 5 _____

Policies Map designation _____

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 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 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.

The Draft Local Plan identifies a housing need for Barnet of 35,460 new homes (2,364 per annum, London Plan 2021 target) over the Plan Period from 2021 up to 2036, while providing a supply of sites for up to 46,000 new homes (3,060 per annum) which is based on the Objectively Assessed Need for Housing as identified in Barnet's SHMA 2018. Policy GSS01 and Table 5 set out how the housing targets will be met.

The strategy outlined in Policy GSS01 and Table 5 is not sound as it is over reliant on large and complex urban regeneration sites, and is not compliant with London Plan Policy H2 with regard to small sites.

Over-Reliance on Large Sites

The proposed strategy for meeting housing need is overly optimistic and not effective as it is over-reliant on complex urban regeneration sites. It is not justified as there is insufficient evidence provided that these large urban regeneration sites will deliver in the required timescales. This issue has previously been acknowledged in Barnet's Housing Delivery Action Plan (2020) which states that a '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 example, the Brent Cross Growth Area is proposed to deliver 9,500 homes by 2036. Section 4.15 of the draft Local Plan notes that the development of the Brent Cross Growth Area is dependent on factors relating to land ownership, viability and phasing. The existing outline planning application was approved in 2010 and will need to be supplemented through further planning applications to update areas of the masterplan. The size, complex history and landownership arrangements of this site make it difficult to guarantee that 9,500 homes will be delivered by 2036 and sufficient evidence is not provided to justify this.

At Edgware Town Centre, 5,000 new homes are expected to be delivered by 2036, with 3,350 of these by 2031. However, the Council has not yet received any development proposals for this site and does not indicate that they have had discussions with developers or landowners. There could be complex issues to do with landownership, viability or previous uses of the site which may delay delivery and these do not appear to have been sufficiently assessed. Therefore, insufficient evidence is provided that 3,350 homes will be delivered in Edgware Town Centre in the next ten years, and 5,000 by 2036.

The two examples above indicate that the reliance on large sites in the draft Local Plan is not justified. The plan is therefore not sound in this regard.

In order to make the plan sound, an alternative scenario for meeting housing need should be considered which includes more allocated medium sites, including targeted release from Metropolitan Open Land (MOL), where MOL is providing no public benefit, that could be delivered in the shorter term. The land to the east of Colney Hatch Lane, which Taylor Wimpey Strategic Land has an interest in, is one example of MOL land which is suitable to deliver housing. It is a vacant former ILEA playing field site which does not provide any public benefit in terms of useable public open space and recreation as it is not publicly accessible. The site is unconstrained, available and deliverable within the plan period. This is an example of a suitable smaller/medium site which would assist with meeting Barnet's housing need and reduce the over reliance on large, complex urban regeneration sites to meet the housing requirement in the shorter term.

Small Sites

The proposed strategy for meeting housing need is not justified as there is an overreliance on very large regeneration sites, that will take a long time to deliver, and it is not consistent with London Plan Policy H2 and the strategic priority of increasing housing delivery from small sites (below 0.25ha). Only 5,100 of 46,000 new homes in the plan period are to be delivered through small sites. The London Plan (Table 4.2) sets out a target for Barnet of 4,340 net housing completions on small sites within ten years. If this figure is extrapolated at 434dpa for the plan period, at least 6,510 homes should be planned for on small sites in the new Local Plan.

The plan therefore fails to meet the London Plan's target for net housing completions on small sites and some small to medium size sites should be allocated, rather than a reliance on windfalls. This is not compliant with London Plan Policy H2, which states that boroughs should pro-actively support well-designed new homes on small sites, in order to significantly increase the contribution of small sites to meeting London's housing needs. The plan's figure of 5,100 homes is 'based on previous trends for delivery from small sites'. The figure of 5,100 is not a pro-active approach to delivery of small sites and further small to medium sites should be allocated.

As confirmed in paragraph 4.2.1 of the London Plan, increasing the rate of housing delivery from small sites is a strategic priority. The draft Local Plan is therefore unsound, as it is not in compliance with the targets set out in London Plan Policy H2 and the deviation from this policy is not sufficiently justified.

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.

In order to achieve a sound strategy, the Council need to allocate more small/ medium sized, available and deliverable sites that could deliver homes in the short to medium term, until the larger, complex regeneration sites deliver housing on a regular basis. This would ensure that a five-year housing land supply is in place, and provide other benefits such as the earlier provision of affordable housing.

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.

The Spatial Strategy set out in Policy GSS01 is a complex issue that needs to be discussed to ensure that the plan is sound.

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.

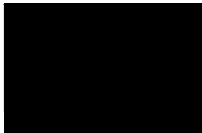
Your details will be kept in accordance with the Council's Privacy Notice, until the Local Plan is adopted plus a further five years to evidence that a fair and transparent process has been followed. Processing is kept to a minimum and data will only be processed in accordance with the law. We will take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

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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

A solid black rectangular box used to redact the signature of the respondent.

Date 02/08/2021