



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 / ECC06_____ Paragraph _____ Figure/Table ___Table 5 / Table 5 A / Figure 3 _____

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 checked="" 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 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.

We consider that the plan is not sound and in accordance with the NPPF, for the reasons outlined in our covering representations, which has been submitted in support of this form.

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.*

In order to make the plan sound and in accordance with the NPPF, the Local Planning Authority must use the standard methodology to calculate its housing need, in accordance with paragraph 61 of the NPPF. The only exception to this is if the Council justifies an alternative approach which also reflects current and future demographic trends and market signals, which it is yet to do so.

Once the housing need has been assessed against the standard methodology, the Council should assess whether it meets the criteria under paragraphs 140 and 141 of the NPPF, as outlined in our covering representation.

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.

To date we have yet to see the Inspectors Matters, Issues and Questions or the Council's response to these. We are likely to wish to attend the hearing sessions to make representations as to the Council's soundness on its approach to identifying it's housing need and need for a Green Belt review.

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 Alex Smith Date 9th August 2021

London Borough of Barnet Draft Local Plan (Regulation 19) Consultation

Land to the south of Barnet Road and east and west of Glebe Lane, Arkley

Representations on behalf of Whetstone Properties Limited

These Representations are submitted on behalf of Whetstone Properties Limited (WPL) who are the promoters of the site known as “*Land to the south of Barnet Road and east and west of Glebe Lane*”, hereinafter referred to as ‘the site’.

In response to the London Borough of Barnet Draft Local Plan (Regulation 18) Preferred Approach Consultation, Simply Planning Limited submitted a detailed representation to the public consultation to outline how we considered that the preferred approach could not be considered sound or in accordance with the NPPF. The full details of this representation will not be repeated in this submission, but a copy of our regulation 18 consultation response is provided as **Document 1**. A brief summary of our previous representations are as follows:

- The draft Local Plan fails to use the Standard Methodology to establish the Borough’s housing need for the next plan period, or provide any exceptional circumstance to justify an alternative approach;
- The plan fails to demonstrate a five year land supply for housing that are available and deliverable to meet the Council’s stated housing need within the draft Local Plan;
- The Council has failed to properly assess whether the tests under the NPPF are met for a release of Green Belt land to be accepted, in order to meet its required housing need.

In the Council’s ‘Local Plan Regulation 18 Town and Country Planning (Local Planning) (England) Regulations - Schedule of Representations and Responses - June 2021’ they provided the following comments in relation to our previous representations.

Policy	Summary of Comments	Council’s Response
BSSA1	It cannot be considered to form ‘exceptional circumstances’ and we consider the use of a housing figure of 46,000 is not in accordance with paragraph 60 of the NPPF and the plan cannot be considered sound with such a significant shortfall against the standard methodology	The housing target is now the London Plan target of 35,460 . Paragraph 0.0.21 of the London Plan 2021 sets out that boroughs do not need to revisit the housing targets set by the Mayor. In addition to this paragraph: 013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance is clear that where a spatial development strategy (in this case the LP2021) has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to revisit their local housing need figure when preparing new strategic or non-strategic policies
Section 4.3	We consider that the Green Belt review undertaken to date has been completed through the blinkered lens that the minimum housing need for the borough is the figure of 46,000 provided by in Barnet SHMA, which has resulted in a significantly depressed housing need compared to the Standard Methodology. Based on this dampened housing need, the Council has failed to fully consider and assess whether the requirements of paragraphs 136	The Green Belt study was carried out in accordance with the NPPF and within the framework provided by the London Plan. The draft Local Plan demonstrates how Barnet will accommodate growth through Policies BSS01 and GSS01. As such, the review does not support making the case needed to demonstrate that exceptional circumstances exist sufficiently to justify making revisions to the existing Green Belt and MOL boundaries. Barnet’s Green Belt Study will help inform any future

Policy	Summary of Comments	Council's Response
	<p>& 137 of the NPPF have been met and if exceptional circumstances exist for the release of Green Belt Land. In addition, this needs to be considered in the context of the Panel Report / Recommendations and Letters from the Secretary of State, which requires the Mayor to undertake an immediate full review of the Green Belt and London Plan to determine if any suitable sites exist for release. This is highly likely to be required, given the panel's conclusions on the ability for London to meet the minimum housing need using the Standard Methodology using existing land capacity. Therefore, the London Borough of Barnet should be proactively undertaking the same assessment, to ensure the soundness of its plan.</p>	<p>London wide review led by the Mayor. Any revisions to Green Belt / MOL made through the next review of the London Plan will be reflected in the Local Plan after this.</p>
<p>Unallocated Land</p>	<p>As such, we would request that the site is reconsidered once again, once the Council has revised its approach to the preparation of the plan, to ensure soundness in relation to its assessment of the minimum housing need via the Standard Methodology. Once completed, we consider this will lead to the inescapable conclusion that a full stage 2 Green Belt review will be required and detailed consideration given to whether Green Belt land can be released under the exceptional circumstances outlined in Paragraph 136 & 137 of the NPPF.</p>	<p>Paragraph 0.0.21 of the London Plan 2021 sets out that boroughs do not need to revisit the housing targets set by the Mayor. In addition to this paragraph: 013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance is clear that where a spatial development strategy (in this case the LP2021) has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek No Page 185 of 197 to revisit their local housing need figure when preparing new strategic or non-strategic policies. The next version of the London Plan is expected to respond to the need for a strategic review of the Green Belt / MOL.</p>

Assessment of Housing Need

In our previous regulation 18 consultation response, we highlighted that the regulation 18 draft Local Plan identified that the standard methodology for the London Borough of Barnet would mean a housing requirement of 4,126 dwellings per annum, giving a requirement of 62,000 dwellings during the plan period to 2036.

However, since this time the government has amended the standard methodology to require the 20 largest cities within England to have a 35% uplift to their housing need. As such, the Council's identified housing need using the standard methodology with a 35% uplift would equate to 5,361 dwellings per annum, which is now a requirement of 80,415 dwellings during the plan period to 2036.

As outlined above, the Council have responded to our previous regulation 18 representation to advise that the draft Local Plan has been updated to have a housing figure of 35,460 dwellings over the course of the plan period. This figure is the housing requirement which has been included in the 2021 version of the London Plan. The Council's response notes the guidance at paragraph: 013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance, which states as follows:

“Where a spatial development strategy has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to re-visit their local housing need figure when preparing new strategic or non-strategic policies.”

The above is noted and is a material consideration. However, during the examination and adoption of the London Plan the housing need that was planned for was a significant issue. The new London Plan was submitted for

examination prior to 24th February 2019. Therefore, in accordance with paragraph 214 of the NPPF (2019 version), the London Plan was assessed for soundness under the 2012 version of the NPPF and so was not subject to the requirements of Paragraph 61 of the NPPF (2021 version), which requires the standard methodology to be used to determine local housing need, unless exceptional circumstances apply.

The Secretary of State's Letter to the Mayor of London dated 27 July 2018 confirms that the Secretary of State amended footnote 69 of the revised National Planning Policy Framework so that the draft London Plan would be examined against the previous National Planning Policy Framework rather than new national policy. However, this was done on the basis that a review of the London Plan was commenced immediately after adoption, to ensure that it is brought into line with the revised NPPF in relation to house need assessment and the standard methodology. This was also re-iterated as necessary in his letter to the Mayor dated 12th March 2020.

Most recently in agreeing to the publication of the London Plan 2021 the Secretary of State (in his letter of 29th January 2021) reiterated the need to commence work on the next London plan so as *"to bridge the significant gap between the housing it seeks to develop and the actual acute housing need London faces"*. The same letter expressly references the Secretary of State's powers to direct review of the latest London Plan, with obvious implications given the past and acknowledged ongoing failure to deliver against London's true housing need.

The draft Local Plan falls to be considered under the 2021 version of the NPPF. This national guidance is clear that the standard methodology is required to be used, unless exceptional circumstances are met.

Whilst the guidance in the PPG relating to housing need and spatial development strategies are noted, this does not override the requirements for the Local Plan to be tested for soundness against the current version of the NPPF, which is something that was not undertaken or required when the 'spatial development strategy' (i.e the 2021 London Plan) was examined and found sound.

It is acknowledged in writing by the London Plan EiP Panel and the Secretary of State that the new London Plan is failing to meet its identified housing need. Therefore, this cannot be considered a sound basis for establishing the housing need in the Local Plan, especially when this is due to be assessed against a different version of the NPPF and one which is explicit that the standard method that should be used to establish housing need.

Given the above, we do not consider that the Council's approach to establishing its need is sound and in accordance with the NPPF as the guidance outlined in paragraph: 013 Reference ID: 2a-013-20201216 of the Planning Practice Guidance, is not an exceptional circumstances which justifies an alternative approach, as it does not reflect current and future demographic trend or market signals and is based on an approach which fails to identify the housing need for London.

The standard methodology with the required 35% uplift gives a housing need for LB Barnet of 80,415 dwellings during the plan period to 2036. The draft Local Plan intends to proceed using the London Plan standard of 35,460 dwellings. As such, the plan is currently underproviding by 44,955 dwellings over the course of the plan and will meet well below the housing need identified using the standard methodology.

Therefore, we consider that the regulation 19 draft Local Plan cannot be considered sound when assessed against the 2021 version of the NPPF, as it conflicts with paragraph 61 by failing to use the standard methodology to identify its housing need or to provide an exceptional circumstance that would allow it proceed using an alternative approach which that reflects current and future demographic trends and market signals.

Green Belt Review

In our previous regulation 18 consultation response, we advised that we considered that the draft Local Plan was not sound, as it the Council has failed to correctly identify it's housing need through the standard methodology. This has led it to conclude that it would not be able to establish the exceptional circumstances would not exist under paragraph 140 & 141 of the NPPF (2021 version).

In response to this submission, the Council response above states that it considers that the Green Belt Review does not support making the case needed to demonstrate that exceptional circumstances exist to justify a revision to the Green Belt boundary. It also notes that the Council considers that this review should be undertaken through the review of the next London Plan.

We again reiterate that this approach cannot be considered to be in accordance with the NPPF and fails to properly assess whether a Green Belt boundary amendment can be justified through exceptional circumstances. The approach taken by the Local Planning Authority in this stance is similar to its approach over housing need. It is far too reliant on the London Plan, which was examined and found sound under the 2012 version of the NPPF, rather than the 2021 version that the draft Local Plan will be examined against.

As outlined above, the Local Plan is failing to meet its identified housing need using the standard methodology and the shortfall using this is 44,955 dwellings over the course of the plan period. Therefore, the level of shortfall required to meet its identified housing needs means that the LPA must consider all options available to it, including an assessment over whether the plan meets the requirements of Paragraphs 140 & 141 of the NPPF.

In relation to relying on the London Plan green belt review the Panel Report for the London Plan, the Panel concluded that the capacity available within London is insufficient to meet the identified annual need for housing and the potential shortfall of industrial land in the medium to longer term. As such, in the Report they noted the following comments:

455. Conflicting evidence has been provided about the extent of urban brownfield land and brownfield or other land within the Green Belt that might be suitable for sustainable development. The Plan itself observes that some Green Belt land is derelict and unsightly and does not provide significant benefits. In any event it is implausible to insist that the Green Belt is entirely sacrosanct without having considered what it comprises and the impact that it has on wider strategic objectives. Furthermore, the NPPF does not entirely rule out changes to Green Belt boundaries although exceptional circumstances are required to justify this.

456. The Mayor argues that however it is done such a review would take some time to complete. A commitment to undertake one could nevertheless be contained within the Plan. Indeed, from our perspective it would be a logical step to do this as part of on-going future plan preparation and to assess, as an option, whether it would be reasonable to release Green Belt land in order to close the gap between housing need and supply in London. This is especially given the difficulty of accommodating growth in the wider South East. There is also a need to consider medium to longer term industrial needs.

457. Therefore from the evidence we heard the inescapable conclusion is that if London's development needs are to be met in future then a review of the Green Belt should be undertaken to at least establish any potential for sustainable development. Therefore we recommend that this Plan include a commitment to a Green Belt review.

Given the above, the Panel recommended that the Local Plan be amended to include a commitment to a Green Belt review, as the Panel raised a serious concern that the capacity available within London is not sufficient to meet the

identified housing need, when the standard methodology is used and a higher need figure required under the immediate review required by the Secretary of State.

In the Panel Report consideration was given as to whether there should be an immediate review of the London Plan and they concluded in Paragraph 595 that:

“595. Furthermore, the position in London is that capacity for new housing development is finite. Indeed, the Plan relies on re-cycled land. The approach of sustainable intensification can only be taken so far without having an adverse impact on the environment, the social fabric of communities and their health and well-being. Therefore, in our view, there would be little to be gained from requiring an immediate review until such time as a full review of London’s Green Belt has been undertaken as recommended to assess the potential for sustainable development there and whether and how the growth of London might be accommodated.”

Whilst the Panel’s comments relate to the whole of London, given the extent of the shortfall and the housing numbers planned for by the draft Local Plan, we would suggest that a very similar position must exist within LB Barnet. Therefore, a full Green Belt review must be required to determine if release of land from the Green Belt can occur, given that the Local Plan will be required to use the standard methodology for its housing numbers, unless it can demonstrate exceptional circumstances.

By attempting to rely on a future Green Belt review at a wider spatial level, the LPA are attempting to kick the can down the road, when it comes to properly planning to meet its identified housing need. The London Plan was adopted under the basis of 2012 NPPF and in recognition that it was failing to meet its identified housing need or properly assess if Green Belt released could be permitted under the NPPF. The draft Local Plan will not be afforded the same opportunity, as it will not be assessed under the 2012 NPPF, so it will need to plan for higher housing numbers which include properly considering whether the test of paragraphs 140 and 141 of the NPPF.

Provided as **Document 2** is a detailed site assessment of our client’s site. This provides a comprehensive assessment of their candidate site, which shows that it is free from any technical constraint that could not be suitably mitigated against by a well designed residential development. It also demonstrates that a residential development at the site would not conflict with any of the purposes for Green Belt, as outlined under paragraph 138 of the NPPF.

Deliverability of Identified Housing Need

The draft Local Plan seeks to deliver a minimum of 46,000 dwellings during the plan period to 2036, with the plan based on the housing need of the London Plan of 35,460 dwellings or 2,364 dwellings per annum. For the reasons outlined above, we consider that this housing need is unsound to be used as for the Spatial Strategy for the plan.

Notwithstanding this point, we also express serious concerns that the plan fails to properly identify specific and deliverable sites for years one to five of the Local Plan period.

Paragraph 4.8.1 of the Local Plan reflects paragraph 68 of the NPPF and sets out how identified housing need can be met over the Plan period and it states that:

“The Local Plan sets out how the London Plan housing target can be met over the Plan period. It must demonstrate a clear understanding of the land available, including existing growth areas, taking into account availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the Local Plan period; and*
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the*

Plan.”

Table 5 within the London Plan is replicated below and it identifies how the 46,000 dwellings would be delivered during the plan period, with Table 5A being added into the draft Local Plan at regulation 19 stage.

Table 5 - New Homes Delivery – 2021/22 to 2035/36

	Years 1-5	Years 6-10	Years 11-15	Total Supply
	2021/22	2026/27	2031/32	
	-	-	-	
	2025/26	2030/31	2035/36	
<i>Brent Cross</i>	600	3,700	5,200	9,500
<i>Brent Cross West</i>	-	-	1,800	1,800
<i>Cricklewood</i>	1,250	150	-	1,400
<i>Edgware</i>	100	3,250	1,650	5,000
<i>Colindale</i>	3,000	1,100	-	4,100
<i>Mill Hill East</i>	1,200	200	100	1,500
Growth Areas Sub-Total	6,100	8,400	8,800	23,300
District Town centres	1,950	2250	1,200	5,400
Existing & New Major Transport Infrastructure	-	950	700	1,650
Estate renewal & infill	1,350	2,500	550	4,400
Major Thoroughfares	2,050	1,300	-	3,350
Other large sites	1,100	1,500	200	2,800
Small Sites (under 0.25 ha)	1,700	1,700	1,700	5,100
Total	14,250	18,600	13,150	46,000

Table 5A Contribution of Identified Sites on Sites Schedule to New Homes Delivery.

	Years 1-5	Years 6-10	Years 11-15	Total
Contribution from Sites Schedule	4,600	10,400	2,200	17,200

Based on the approach outlined in the draft Local Plan, with the housing need of the London Plan taken at 2,364 dwellings per annum, this equates to a total of 11,820 over the first five years of the plan period. The Council’s figures outlined above state that the Site Schedule of new Homes only identifies the delivery of 4,600 homes in the first five years of the plan period.

As such, the plan is falling significantly below the required figure and substantially relies on the broad growth areas for the delivery of housing in the early years of the plan period. As outlined in paragraph 68 and the Glossary of the NPPF, these sites can only be relied upon for years 6 to 10 and 11 to 15 of the plan and so the plan is failing to meet the requirements of paragraph 67 of the NPPF, even with the housing need from the London Plan used as the base housing need requirement.

Further to the above, a total of 1,309 dwellings would be developed at the Sainsbury's, The Hyde (site No.14). The source for inclusion of this site as an allocation is due to it being submitted as a candidate site. It seems highly unrealistic, and out of step with the other delivery timeframes within the allocations, to state that a development of this size could be progressed through the planning process and wholly developed out within a 5 year time period.

Indeed, the current planning consent for development of the site envisages the scheme coming forward on a phased basis (3 phases) with the first two phases comprising enabling works together with construction of a new supermarket and 770 of the proposed residential units. The remaining 539 units only come forward in Phase 3 once the first two phases are complete. The EIA accompanying the application goes onto confirm that: *"...the works are anticipated to complete in 2030"*. As such, 2030, is considered to be the full year of completion and occupation of the development, which falls well beyond the identified 1 to 5 year window for development in the site allocation.

Further sites that are also relied upon for the 5 year land supply include Land at Whalebones (Site No.45) for 152 units, where a planning application for the same number of dwellings was refused in July 2019 (app reference: 19/3949/FUL) with the refusal reason relating to the loss of the open space and its impacts on the character and appearance of the Conservation Area. This is a fundamental issue with developing the land and if the Council have refused a planning application on these grounds, it cannot consider it deliverable and suitable for a housing allocation.

The site at Broadway Retail Park is also listed as a site which will deliver housing in the first five years of the plan. For this site the allocation is stated as being 1,007 dwellings. However, a live application remains at the site (it is not refused as reference in the draft Local Plan, but this indicate the Council's previously intended direction of travel). The application has been subject to hundreds of objections and an amendment to reduce the height of the buildings within the site by six storeys. As such, it is not clear if the Council would support a development to the scale being suggested within the allocation, given the substantial public objection to the planning application at this site. Moreover, even if the site does gain planning consent, the accompanying EIA confirms that the actual construction programme will take in excess of five years. To, therefore, rely on this site delivering over 1,000 units in the first five year period from 2021 is simply unrealistic.

The above three sites equate to 2,468 dwellings out of the total five year supply of 4,600 homes where we would identify significant concerns with these sites being deliverable within the first five years of the plan, at the numbers proposed. Therefore, we consider that the plan cannot be considered sound, as it significantly fails to identify a specific supply of deliverable sites for the first five years of the plan, as required by paragraph 68 of the NPPF.



Land to the south of Barnet Road and east and west
of Glebe Lane, Arkley

Representations

Document 1

Consultation response to draft Local Plan (Reg 18)
Consultation

London Borough of Barnet Draft Local Plan (Regulation 18) Preferred Approach Consultation

Land to the south of Barnet Road and east and west of Glebe Lane, Arkley

Representations on behalf of Whetstone Properties Limited

These Representations are submitted on behalf of Whetstone Properties Limited (WPL) who are the promoters of the site known as “Land to the south of Barnet Road and east and west of Glebe Lane”, hereinafter referred to as ‘the site’.

We have reviewed the Draft Barnet Local Plan (Reg 18) January 2020 (hereinafter the draft Local Plan) which has been made available for public consultation and we consider that the approach being proposed by the Council would result in the plan being found unsound. This representation letter will cover the following areas to provide our evidence which has led us to this conclusion:

- Assessment of Housing Need;
- Deliverability of Proposed Allocations; and
- Use of Green Belt Land.

The representation will then also review the material benefits arising from the inclusion of the site within the Local Plan, to explain how it’s inclusion would assist in rectifying the current flaws in the plan preparation to date.

Assessment of Housing Need

On 19th February 2019 the Ministry of Housing, Communities and Local Government (MHCLG) published the outcome of the ‘*Technical consultation on updates to national planning policy and guidance*’ which ran between 26 October and 07 December 2018.

The proposals put forward by Government in the consultation were taken forward and incorporated within an updated version of the Planning Practice Guidance (PPG) on ‘Housing and economic needs assessment’ published on 20 February 2019.

Included within the updated PPG was a new standard methodology for undertaking housing need assessments for the preparation of development plans. The requirement to use this method is enshrined at paragraph 60 of the NPPF which states:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.”

Draft Policy BSS01 of the draft Local Plan provides the spatial strategy for the Development Plan. It is the lynchpin of the Development Plan to ensure that the Council’s spatial vision is realised during the plan period. This Policy states, amongst others, that a minimum of 46,000 homes will be provided during the plan period between 2021 and 2036.

Paragraphs 4.3.1 to 4.3.6 of the draft Local Plan states how the housing figure for the plan period has been reached. It states that in 2018 the Council, in partnership with the West London Alliance, commissioned a Strategic Housing Market Assessment (SHMA) for the Borough of Barnet and the sub-regional SHMA for West London. Barnet's SHMA identifies that the full Objectively Assessed Need (OAN) for housing in Barnet is 3,060 dwellings per year, which over the 15 year plan period equates to a total of 46,000 dwellings. As such, the draft Local Plan has proceeded based on this housing figure.

It is our position that this approach is wholly flawed. Paragraph 214 of the NPPF outlines the transitional arrangements for the implementation of the revised NPPF (2018 then 2019 versions) and this states as follows:

“The policies in the previous Framework published in March 2012 will apply for the purpose of examining plans, where those plans were submitted on or before 24 January 2019. Where such plans are withdrawn or otherwise do not proceed to become part of the development plan, the policies contained in this Framework will apply to any subsequent plan produced for the area concerned.”

At the time of writing this representation, the Local Plan has not been submitted to the Planning Inspectorate and so the 24th January 2019 deadline has passed. Therefore, the plan will be examined against the 2019 version of the NPPF and paragraph 60 (outlined above) will apply. This means that the Standard Methodology should be used for calculating housing need.

The PPG provides clarification on whether the use of the Standard Methodology is mandatory at Paragraph: 003 Reference ID: 2a-003-20190220 and this reflects paragraph 60 of the NPPF and states as follows:

“No, if it is felt that circumstances warrant an alternative approach but authorities can expect this to be scrutinised more closely at examination. There is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstances.”

Both the NPPF and PPG are clear that the Standard Methodology should be used, unless exceptional circumstances are demonstrated.

The draft Local Plan identifies that the standard methodology for the London Borough of Barnet would mean a housing requirement of 4,126 dwellings per annum, a requirement of 62,000 dwellings during the plan period to 2036. Therefore, the draft Local Plan would result in a shortfall of 16,000 dwellings during the lifetime of the plan, meaning that it cannot be considered to be sound when considered against the nationally prescribed methodology for calculating the “*minimum annual housing need figure*” (PPG Paragraph: 002 Reference ID: 2a-002-20190220) which is enshrined within the NPPF.

The NPPF and PPG confirm that an alternative methodology can be used where “*exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.*”

The draft Local Plan and the supportive evidence fails to outline any exceptional circumstances which justify using an alternative approach. On the issue of the standard methodology the draft Local Plan states at paragraph 4.3.2 the following:

“To achieve its national housing targets the Government (MHCLG) set out minimum housing requirements through the ‘Standard Method’ approach. This is an unconstrained assessment of the number of homes needed in an area and requires greater refinement as part of the Local Plan’s design led and place-shaping approach to delivering growth in response to Barnet’s objectively assessed housing need. Figures published in February 2019 revealed Barnet’s minimum housing requirement as 4,126 new homes per annum (see Table 4 below). This

target is the second highest housing requirement in England. It is therefore more challenging than any previous targets set for Barnet through the London Plan. The West London SHMA completed in October 2018 considered the Government’s standard method for calculating Local Housing Need, introduced by MHCLG in July 2018.”

The above does not outline any exceptional circumstances and refers back to the West London SHMA completed in October 2018.

The overarching issue with the West London SHMA and also the London Borough of Barnet SHMA is that it does not follow the approach of the standard methodology. The figures calculated within this approach are based on the determining the Objectively Assessed Need (OAN) with the approach being wholly different to that outlined in the Standard Methodology. Therefore, the proposed minimum housing target of 46,000 is based on an outdated approach which has been replaced by the Standard Methodology and no exceptional circumstances for this have been outlined.

The West London SHMA and London Borough of Barnet SHMA have considered the implications of using the Standard Methodology. However it should be noted that these documents were published in October 2018, which was before the outcome of the consultation on ‘*Technical consultation on updates to national planning policy and guidance*’ was finalised and before the results were published in January 2019 and PPG updated in February 2019.

Step 1 in the Standard Methodology is to set the baseline using national household projections. The PPG is clear in Paragraph 005 Reference ID: 2a-005-20190220 that the national household projections which should be used are the 2014 figures and it states:

“The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes.”

The West London SHMA states the following in relation to the approach required by the standard methodology:

Assessing Overall Housing Need: Analysing the Impact of PPG Changes Proposed by CLG

^{1.31} On September 14th 2017, Department of Communities and Local Government (CLG) published a consultation on potential revisions to the NPPF, including a standardised methodology for calculating objectively assessed housing needs (OAN). This contained a number of key proposals:

- » The starting point for calculating the OAN for any area should be the most up to date household projections published by CLG;
- » While, deviation from this starting point can be considered, the consultation proposals note that; *There should be very limited grounds for adopting an alternative method which results in a lower need;* and
- » The household projections published by CLG should be uplifted by a fixed affordability relationship based upon the ratio of house prices to earnings. The maximum uplift for a local authority area will be 40% above its CLG household projections or current Local plan housing target.

It is clear that the West London SMHA and London Borough of Barnet SHMA has been prepared using the September 2017 CLG consultation document. Paragraph 005 Reference ID: 2a-005-20190220 was published on 20th

February 2019 and represents the most up to date guidance on how the standard methodology should be calculated, which confirms that the 2014 household projections should be used.

However, the West London SHMA and also the London Borough of Barnet SHMA have adjusted the household projections to use the 2016 based household projections, which has a significant impact on dampening the housing need, as outlined in figure 4 below from the London Borough of Barnet SHMA.

1.11 Since the publication of the figures in September 2017 a range of new data has been released which allows for the model to be updated. This includes:

- New affordability data released in March 2018;
- New 2016 based sub-national population projections (SNPP) released in May 2018; and
- New 2016 based household projections were released by the Office for National Statistics in September 2018.

1.12 Therefore, the figure for Barnet as of September 2018 is 2,683 dwellings per annum.

Figure 4: Estimated Annual OAN Using CLG Standardised Methodology. (Source: CLG and ORS Estimates)

Local Authority	Annual OAN		
	CLG Published Estimate September 2017	Updated Estimate based upon March 2018 Affordability and 2016 based SNPP	Updated Estimate based upon March 2018 Affordability, and 2016 based ONS household projections
Barnet	4,126	3,439	2,683
West London Total	14,098	12,026	8,993
Greater London Total	72,408	62,826	49,535

Therefore, the use of the 2016 household projections have lowered the housing need for Barnet when the standard methodology approach is used and these figures have been used in error, as the West London and London Borough of Barnet SHMA methodology relies on consultation proposals as oppose to the final published guidance, when considering which household projections should be used.

The PPG is clear that the Government has chosen to use the 2014 projections to ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes.

The draft Local Plan and supporting evidence does not outline the exceptional circumstances' which the Council are relying on, to justify not using the standard methodology and using the OAN from the Barnet SHMA instead. However, if it is the Council's position is that the OAN contained within Barnet SHMA results in a higher housing need than the standard methodology, then we would conclude that this position is not tenable, by reason that the housing need assessment using the standard methodology in the West London and Barnet SHMA is not in accordance with national planning guidance and uses the incorrect housing projections for its baseline.

Therefore, it cannot be considered to form 'exceptional circumstances' and we consider the use of a housing figure of 46,000 is not in accordance with paragraph 60 of the NPPF and the plan cannot be considered sound with such a significant shortfall against the standard methodology.

The supporting text to Policy BBS01 of the draft Local Plan outlines 6 alternative options to the spatial strategy, which are listed as follows:

- Not to include a spatial strategy;
- Setting a lower housing target;
- Retain existing spatial vision;
- Set a housing target based on capacity using brownfield sites and also developing green field / Green Belt sites;
- Set a maximum housing target in accordance with Draft London Plan; and
- Set a housing target expressed as a range using the London Plan Panel report recommended target for Barnet (2,364 homes per annum) as the lower figure.

We do not consider that this is a suitable assessment of the alternative options available to the Council. Firstly, no reasoned justification is provided in relation to the why the figure calculating using the standard methodology is not appropriate. If this higher figure is used, then there is a significant objection that the Council has not fully considered whether the release of Green Belt land would meet the exceptional circumstances under paragraphs 136 & 137 of the NPPF, which is discussed in further detail below.

In relation to the London Plan, we agree with the position that setting a maximum housing target which complies with the draft London Plan figure of 3,134 dwellings per annum would be not found sound. It would not be consistent with paragraph 59 of the NPPF and the government's aim of significant boosting housing land supply to place a maximum housing figure during the plan period. However, there is no reason to not consider using the London Plan figure and expressing this as a minimum requirement.

The Secretary of State's Letter to the Mayor of London dated 27 July 2018 confirms that the Secretary of State amended footnote 69 of the revised National Planning Policy Framework so that the draft London Plan would be examined against the previous National Planning Policy Framework rather than new national policy. However, this was done on the basis that a review of the London Plan was commenced immediately after adoption, to ensure that it is brought into line with the revised NPPF in relation to house need assessment and the standard methodology.

Given that the draft Local Plan will be assessed against the revised methodology also and that there is a need for an immediate review of the London Plan after publication, then it seems highly unreasonable that an Inspector would find a plan unsound which promotes a higher housing figure than that stated in the Intend to Publish London Plan (December 2019), given that this was assessed under the previous NPPF and needs immediate review.

Deliverability of Identified Housing Need

The draft Local Plan seeks to deliver a minimum of 46,000 dwellings during the plan period to 2036. For the reasons outlined above, we consider that this housing need is unsound to be used as for the Spatial Strategy for the plan. Notwithstanding this point, we also express serious concerns that the plan would be unable to deliver the 46,000 dwellings which it currently plans for and the plan would fail to deliver a suitable provision of housing during the early years of the plan period.

Paragraph 4.7.1 of the Local Plan reflects paragraph 67 of the NPPF and sets out how identified housing need can be met over the Plan period and it states that:

“It must demonstrate a clear understanding of the land available, including existing growth areas, taking into account availability, suitability and likely economic viability. Planning policies should identify a supply of:

a) specific, deliverable sites for years one to five of the Local Plan period; and

b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the Plan.”

Table 5 within the London Plan is replicated below and it identifies how the 46,000 dwellings would be delivered during the plan period.

	Years 1-5	Years 6-10	Years 11-15	Total to London Plan Target
	2021/22 – 2025/26	2026/27 – 2030/31	2031/32 – 2035/36	
Growth Areas	6,800	7,250	7,250	21,300
District Town centres	2,000	2,350	1,750	6,100
Existing & New Major Transport Infrastructure	450	2,300	700	3,450
Estate renewal & infill	1,300	2,200	500	4,000
Major Thoroughfares	3,550	1,000	350	4,900
Other large sites	1,150	-	-	1,150
Small Sites	1,700	1,700	1,700	5,100
Total	16,950	16,800	12,250	46,000

The plan states that 3,550 dwellings would be delivered in ‘Major Thoroughfares’ in years 1 to 5 of the plan. Annex 1 of the draft Local Plan identifies 67 allocated sites for the delivery of housing and employment land. Out of these 67 allocated sites 15 are within Major Thoroughfares and this would provide a total of 3,371 dwellings during the plan period. Therefore, the plan fails to identify specific deliverable sites for 3,550 dwellings for years 1 to 5 of the plan period or any suitable buffer above this figure.

When the 15 sites allocated in Major Thoroughfares are analysed in detail, it becomes apparent that only two sites are considered to be deliverable within years 1 to 5 of the plan, which would provide a total of 1,347 dwellings, well short of the stated amount.

A total of 1,309 dwellings would be developed at the Sainsbury’s, The Hyde (site No.14). The source for inclusion of this site as an allocation is due to it being submitted as a candidate site. It seems highly unrealistic, and out of step with the other delivery timeframes within the allocations, to state that a development of this size could be progressed through the planning process and wholly developed out within a 5 year time period. Indeed, the current planning application for development of the site envisages the scheme coming forward on a phased basis (3 phases)

with the first two phases comprising enabling works together with construction of a new supermarket and 770 of the proposed residential units. The remaining 539 units only come forward in Phase 3 once the first two phases are complete. Therefore, we significantly doubt that anywhere near a total of 1,347 dwellings would be delivered in the Major Thoroughfares in the first 5 years of the plan period.

The draft Local Plan states that 6,100 dwellings would be delivered during the plan period in the District Town Centres. This is replicated in Policy GSS08 ‘Barnet’s District Town Centres’, which states the following:

“Barnet’s Town Centres (excluding Cricklewood and Edgware) have capacity to deliver a minimum of 6,100 new homes.”

Of the proposed 67 allocated sites within Annex 1 of the draft Local Plan, 26 are within identified ‘District Town Centres’ and these sites would deliver a total of 4,485 dwellings. However, provided below is a table which assesses how many dwellings would be delivered during the 5 year intervals of the plan period, based on the indicative timeframes listed in the allocations.

Time Period	0 to 5 Years	6 to 10 Years	11 to 15 Years
Dwellings	391	1672	2422

The above assessment of the proposed allocations for the Town Centres and Major Thoroughfares shows that the sites which are being proposed to be allocated, are not readily deliverable and would be significantly backloaded towards the end of the plan period. Notwithstanding this, Table 5 of the Plan (see earlier) suggest some 2000 units will come forward from this source in years 1 to 5. Therefore, the plan is failing to demonstrate how the specific, deliverable sites are being allocated to meet the identified housing need during the early years of the plan period. As such, we consider that further sites need to be allocated within the development plan, which are immediately deliverable, to ensure the Council can demonstrate a 5 year land supply upon adoption of the plan.

The plan also proposes for a total of 5,100 dwellings to be delivered from small sites during the plan period, which equates to a total of 340 dwellings per year. The 2017/2018 Annual Monitoring Report provides the latest figures on the delivery of housing from small sites, with figure 1 from this document replicated below:

Figure 1 - Yearly Minor Development Completions

2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
421	426	329	389	262	295	221	309	346	360
Total									3,358

The above provides an average delivery of 335 dwellings per annum, which falls just below the figure used in the draft Local Plan. However, it is clear from the above that the average yearly figures have been heavily skewed by delivery in 2008/09 & 2009/10. We consider that it would be more appropriate to use the figures since the adoption of the latest Local Plan, from 2011/2012. Using this seven year period the average figure for housing delivery drops down to 303 dwellings per annum, which would give a total housing delivery over the 15 year plan period of 4,545

dwellings. As such, we consider this to form a more realistic figure for housing delivery from small sites over the plan period.

Green Belt Review

As outlined above, one of the alternative options considered for the Spatial Strategy for the draft Local Plan was to “Set a housing target based on capacity using brownfield sites and also developing green field / Green Belt sites.” The explanatory text for Policy BBS01 provides the Council’s rational for not considering this alternative, which is stated as follows:

“This would provide for meeting a greater proportion of the Borough’s Objectively Assessed Housing Need. However, it would not meet the tests set in NPPF (para 137) necessary in order to demonstrate exceptional circumstances sufficient to justify Green Belt release and therefore a strong likelihood that the strategy would be found unsound.”

Paragraph 136 of the NPPF relates to the circumstances under which Green Belt boundaries can be altered through the plan led process and this states:

“136. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. 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 beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.”

Paragraph 137 of the NPPF outlines that Councils must have fully examined all other reasonable options for meeting its identified need for development to justify changes to the Green Belt boundaries and states what will need to be taken into account before reaching this conclusion:

“137. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;***
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and***
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.”***

We consider that the conclusion that the requirements of Paragraph 137 cannot be met have been reached based on the incorrect figures for housing need. When compared to the minimum housing need from the Standard Methodology, the draft Local Plan would fall 16,000 dwellings short of the meeting the identified need during the plan period. Moreover, the Plan makes overly optimistic assumptions about the time frame and housing delivery

numbers of sites which again calls into question its ability to meet the Borough's housing needs. This is a substantial shortfall and the failure to prepare a plan which is based on this housing figure, means that the Council has failed to consider if the requirements of Paragraph 137 would indeed be met and thus an amendment to the Green Belt boundaries justified.

In the Panel Report from the London Plan, the Panel concluded that the capacity available within London is insufficient to meet the identified annual need for housing and the potential shortfall of industrial land in the medium to longer term. As such, in the report they noted the following comments:

455. Conflicting evidence has been provided about the extent of urban brownfield land and brownfield or other land within the Green Belt that might be suitable for sustainable development. The Plan itself observes that some Green Belt land is derelict and unsightly and does not provide significant benefits. In any event it is implausible to insist that the Green Belt is entirely sacrosanct without having considered what it comprises and the impact that it has on wider strategic objectives. Furthermore, the NPPF does not entirely rule out changes to Green Belt boundaries although exceptional circumstances are required to justify this.

456. The Mayor argues that however it is done such a review would take some time to complete. A commitment to undertake one could nevertheless be contained within the Plan. Indeed, from our perspective it would be a logical step to do this as part of on-going future plan preparation and to assess, as an option, whether it would be reasonable to release Green Belt land in order to close the gap between housing need and supply in London. This is especially given the difficulty of accommodating growth in the wider South East. There is also a need to consider medium to longer term industrial needs.

457. Therefore from the evidence we heard the inescapable conclusion is that if London's development needs are to be met in future then a review of the Green Belt should be undertaken to at least establish any potential for sustainable development. Therefore we recommend that this Plan include a commitment to a Green Belt review.

Given the above, the panel recommended that the Local Plan be amended to include a commitment to a Green Belt review, as the Panel raised a serious concern that the capacity available within London is not sufficient to meet the identified housing need, when the standard methodology is used and a higher need figure required under the immediate review required by the Secretary of State.

In the Panel Report consideration was given as to whether there should be an immediate review of the London Plan and they concluded in Paragraph 595 that:

"595. Furthermore, the position in London is that capacity for new housing development is finite. Indeed, the Plan relies on re-cycled land. The approach of sustainable intensification can only be taken so far without having an adverse impact on the environment, the social fabric of communities and their health and well-being. Therefore, in our view, there would be little to be gained from requiring an immediate review until such time as a full review of London's Green Belt has been undertaken as recommended to assess the potential for sustainable development there and whether and how the growth of London might be accommodated."

When these comments are assessed against the backdrop of the letter from the Secretary of State, it is clear that an immediate review of all the Green Belt will be required to be undertaken, as the panel report raises significant doubt that the housing need required under the standard methodology could be delivered based on current capacity.

Therefore, we consider that the plan preparation to date has failed to consider the London Borough of Barnet's position in relation to the wider spatial context of London, to determine whether it is a suitable candidate for Green Belt release.

Prepared in support of the draft Local Plan is the 'London Borough of Barnet Green Belt and Metropolitan Open Land Study – Stage 1 Final Report – November 2018' (Green Belt Review). Paragraphs 1.2 & 1.3 of the Green Belt Review states the following, which outlines the work undertaken within the review and what would be required at stage 2:

“1.2 To date the Stage 1 study has assessed:

- ***Existing Green Belt land in relation to the five purposes of the Green Belt designation set out in the National Planning Policy Framework 2018 (NPPF) and National Planning Policy Guidance (NPPG), with a view to identifying pockets of land which perform relatively poorly in Green Belt terms.***
- ***The openness of MOL, with a view to identifying pockets of land which have a lack of openness.***
- ***The accuracy and robustness of the existing Green Belt and MOL boundaries, as they appear on the Council's local data layer, recommending appropriate minor realignments along alternative permanent and readily recognisable physical features.***
- ***The potential for the designation of new areas of Green Belt and MOL.***
- ***The potential to build on the work of the GLA's All London Green Grid and related work within the Borough to enhance the Borough's Green Belt and MOL.***

1.3 The findings of the Stage 1 Report and other relevant evidence will help the Council to define a preferred spatial strategy for growth including the selection and allocation of sites for development and safeguarding within the Plan period. If potential sites are identified within the Green Belt and MOL, further Stage 2 work will be required to assess the potential degree of harm to Green Belt and/or MOL as a result of de-designation and development, to identify alternative Green Belt / MOL boundaries where possible using existing permanent and readily recognisable physical features. This Stage 2 work will help the Council to establish the necessary exceptional circumstances for Green Belt boundary revisions (set out in paragraphs 135, 136 and 137 of the NPPF).”

From the outset of the document it is clear that Stage 1 of the Green Belt Review is only a qualitative assessment of the Green Belt and fails to provide any assessment of the degree of harm which might arise from the de-designation and development of the Green Belt, as this forms Stage 2 of the process.

As described at length above, we consider that the draft Local Plan is flawed as it has failed to use the Standard Methodology and has not demonstrated exceptional circumstances which would permit the use of the OAN within the London Borough of Barnet SHMA. Therefore, the plan cannot be considered sound and falls significantly short of the identified minimum housing need.

By using the standard methodology, it would significantly increase the housing need within the London Borough of Barnet and indeed the whole of London. The Secretary of State wrote to the Mayor on 13th March 2020 following his review of the Intend of Publish version of the London Plan. In the letter the Secretary of State wrote:

“Having considered your Plan at length my conclusion is that the necessary decisions to bring more land into the planning system have not been taken, the added complexity will reduce appetite for development further and slow down the system, and throughout the Plan you have directly contradicted national policy. As you know, by law you must have regard to the need for your strategies to be consistent with national policies.

For these reasons I am left with no choice but to exercise my powers to direct changes.

Your Plan must be brought to the minimum level I would expect to deliver the homes to start serving Londoners in the way they deserve. However, this must be the baseline and given this, I ask that you start considering the next London Plan immediately and how this will meet the higher level and broader housing needs of London”

Therefore, it is clear that both the London Borough of Barnet and also the Mayor is required to fully assess and consider if using the Standard Methodology would create a housing need which meets the ‘exceptional circumstances’ outlined in paragraph 136 & 137 of the NPPF, to require the release of Green Belt to meet the identified housing need.

We consider that the failure to undertake Stage 2 of the Green Belt Review would significantly undermine the plan preparation process and also the imminent Green Belt review by the Mayor. As outlined in the Green Belt Review, Barnet is one of the greenest boroughs in London, with 2,466 hectares of Green Belt land, this being 28% of the total area of the borough. This means that Barnet has the sixth highest proportion of its land taken up as Green Belt out of all the London Boroughs. Therefore, it seems highly implausible that if the Mayoral Green Belt review and immediate review of the London Plan requires the release of Green Belt land, that none of this would fall within the London Borough of Barnet. This means that this option should be suitably considered and assessed as part of the plan preparation process and this has not occurred to date.

In conclusion, we consider that the Green Belt review undertaken to date has been completed through the blinkered lens that the minimum housing need for the borough is the figure of 46,000 provided by in Barnet SHMA, which has resulted in a significantly depressed housing need compared to the Standard Methodology.

Based on this dampened housing need, the Council has failed to fully consider and assess whether the requirements of paragraphs 136 & 137 of the NPPF have been met and if exceptional circumstances exist for the release of Green Belt Land.

In addition, this needs to be considered in the context of the Panel Report / Recommendations and Letters from the Secretary of State, which requires the Mayor to undertake an immediate full review of the Green Belt and London Plan to determine if any suitable sites exist for release. This is highly likely to be required, given the panel’s conclusions on the ability for London to meet the minimum housing need using the Standard Methodology using existing land capacity. Therefore, the London Borough of Barnet should be proactively undertaking the same assessment, to ensure the soundness of its plan.

Assessment of Candidate Site

The site was submitted for consideration as part of the draft Local Plan. Appendix 3 of the ‘Site Selection Background Report- December 2019’ provides a list of sites considered to be not developable. The site is included within this list and the reason stated for this is ‘Green Belt’.

As previously addressed, we consider that the draft Local Plan has failed to fully assess whether the exceptional circumstances under paragraph 136 & 137 of the NPPF would be met, to allow a release from the Green Belt.

The Green Belt review has undertaken a qualitative assessment of all areas of the Green Belt in the London Borough of Barnet against the five purposes of the Green Belt Listed under paragraph 134 of the NPPF. The table below shows how the site scored against these five purposes:

Purpose	Assessment
1. To check the unrestricted sprawl of large built up areas.	75% Relatively Strong / 25% Strong
2. To prevent neighbouring towns from merging into one another	Weak
3. To Assist in Safeguarding the countryside from encroachment	75% Relatively Strong / 25% Strong
4. To preserve the setting and special character of historic towns	Relatively Strong
5. To assist urban regeneration by encouraging the recycling of derelict or other urban land.	Strong

In relation to purpose 5, the Green Belt review confirms the following at paragraph 2.63:

“The London Borough of Barnet Brownfield Register¹⁹ contains a record of roughly 1,002.5ha of brownfield land within the Borough. Although no registered brownfield land sits within the Borough’s MOL, roughly 7ha of the registered brownfield land falls within the Green Belt, leaving roughly 995.5ha within the urbanised area of the Borough. This represents 17.2% of the total urbanised area of the Borough, which is roughly 5,773ha. Given a significant proportion of the Borough’s land is brownfield, all Green Belt land within the Borough is considered to make a strong contribution to Green Belt purpose 5.”

Therefore, if the Council were to assess all the Green Belt sites to find suitable sites for release, it would be required to discount purpose 5, as all the land in the Green Belt has been weighted the same.

Looking at the remaining 4 purposes, the site scores weakly in relation to the purpose of preventing towns from merging into one another. In relation to the remaining 3 purposes, the western side and part of the eastern side of the site scores ‘relatively strongly’. It is noted that the eastern side of the site scored strongly on purposes 1 & 3, however, this is the minority of the site and the remaining areas fell below this threshold.

Given that the majority of the site falls outside of the top bracket of ‘strong’ for all the purposes, it is considered that the site is a good candidate for release from the Green Belt, once the Council undertakes the stage 2 assessment of the Green Belt review.

Provided below is the illustrative Concept Plan which was submitted as part of the Candidate Site representation, which shows how the Site might be developed.



The Illustrative Concept Plan identifies both constraints and opportunities and in particular it shows how:

- Access can be achieved to both parcels of land from Barnet Road;
- Potential linking of the two sites across Glebe Lane;
- Potential access to Wylo Drive;
- A landscape buffer to screen and protect the existing housing to the north that front Barnet Road and the existing cottages on Glebe Lane;
- Provision of a landscape/amenity zone on the western boundary to protect the amenity of adjacent houses;
- Retention of existing areas of trees within the site; and
- Retention of a strong landscape margin to the southern boundary to form the new Green Belt boundary which would be contiguous with the existing Green Belt boundary to the immediate west thereby creating a strong, logical and defensible line.

The Concept Plan shows potential development areas. Initial assessments suggest that, adopting a similar building typology to neighbouring developments (detached and semi-detached two storey housing) the combined Site could deliver circa 275 dwellings. This is equivalent to a density of 26 dwellings/hectare and would be consistent with the character of the area.

The site would provide 275 additional dwellings, utilising land within the Green Belt which does not score strongly for the whole site on any of the Green Belt purposes listed under paragraph 134 of the NPPF (with the exception of purpose 5, which all Green Belt land in the borough scores strongly on). Therefore, the site would be able to provide a significant increase to the allocated housing within the development plan and would assist in bridging the gap between the OAN identified in Barnet SHMA and the minimum housing need required by the standard methodology. The Secretary of State has been clear in his letters to the Mayor that he considers the London Plan needs to be reviewed to ensure the minimum housing needs for London are met. Given this, we consider it foolhardy to attempt to progress with a Local Plan which fails to recognise the Standard Methodology as the correct approach to identifying minimum housing need, especially where no exceptional circumstances have even been given for reverting back to the OAN within the Barnet SHMA, which falls significantly short of the housing need in the Standard Methodology.

In addition, the site forms a greenfield site which is readily available for development with no barrier to development. It would be deliverable within the first five years of the plan period and would assist in the short term housing delivery issue which is clear and apparent in the current Spatial Strategy of the draft Local Plan.

As such, we would request that the site is reconsidered once again, once the Council has revised its approach to the preparation of the plan, to ensure soundness in relation to its assessment of the minimum housing need via the Standard Methodology. Once completed, we consider this will lead to the inescapable conclusion that a full stage 2 Green Belt review will be required and detailed consideration given to whether Green Belt land can be released under the exceptional circumstances outlined in Paragraph 136 & 137 of the NPPF.

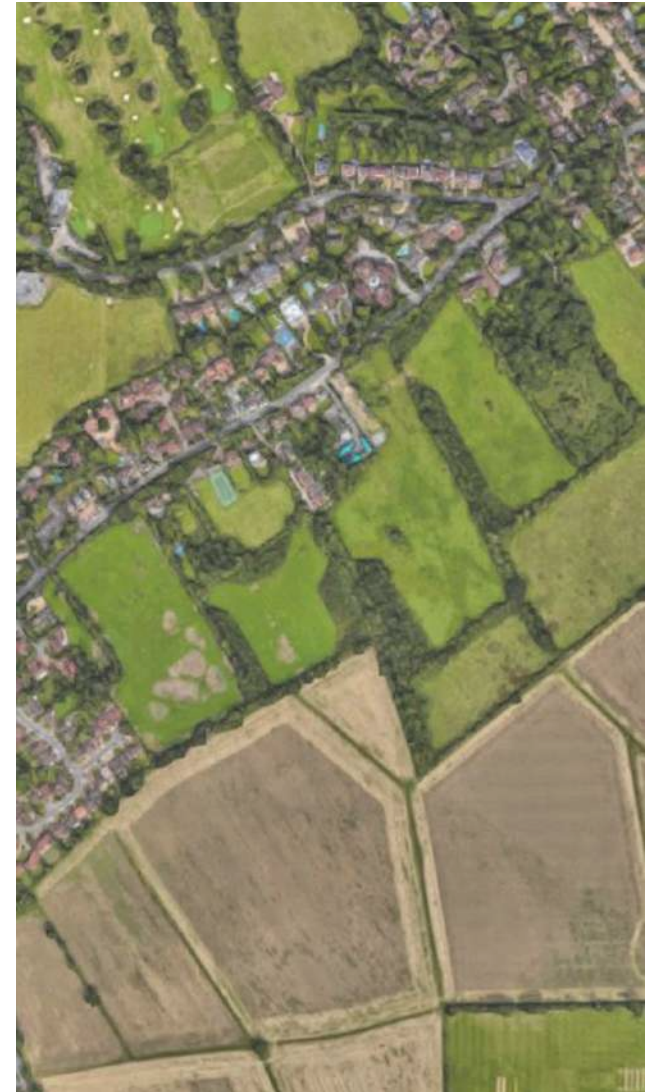


Land to the south of Barnet Road and east and west
of Glebe Lane, Arkley

Representations

Document 2

Land Allocation Document



LAND OFF BARNET ROAD, ARKLEY 41008

Land Allocation document for

CKC Properties Ltd

30/07/21 Rev - BW GG



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1.0 INTRODUCTION

1.0.1 This Vision Document relates to the land on Barnet Road, Arkley. The site location is shown opposite. The purpose of this Vision Document is to demonstrate the suitability, availability and deliverability of the site to inform emerging Local plan preparation.

1.0.2 This Vision Document has been prepared to demonstrate the soundness of this site as a future strategic allocation for residential development, in the context of the emerging Local Plan. The contents of this Vision Document demonstrate how the site should be considered capable of contributing towards delivering the Council's housing need requirement.



Site panoramic



Site Plan

2.0 SITE AND SURROUNDING CONTEXT

2.1 SITE LOCATION

- 2.1.1 The site is located to the south of Barnet Road, either side of Glebe Lane, within the village of Arkley. Arkley is located approximately 1.8 miles to the southwest of the town centre of Chipping Barnet and is within the administrative boundaries of the London Borough of Barnet.
- 2.1.2 The proposed allocation site comprises two parcels of land measuring a total area of 10.6ha. The site is formed of open rough grassland which has been grazed by horses with several groupings of trees located within the site. The site is bordered and physically contained on all sides by a mature treeline and hedgerows. The topography of the land is a gentle slope running downhill away from Barnet Road in the southerly direction.
- 2.1.3 The site is bounded to the west by the residential estates of Rockways and Wylo Drive, with further ribbon residential development to the north of Barnet Road and to the east alongside St Peters Church. The site's landscape character to the south transitions to open undulating fields in agricultural use which is in contrast to the site's urban fringe landscape characteristics.
- 2.1.4 The site in its immediate context is shown in the adjoining image.
- 2.1.5 Ribbon development spans both the northern and southern sides of Barnet Road defines Arkley's settlement character and its morphology. This can be seen by the continuous development which spans along the northern side of the highway. The southern side of the highway is defined by larger blocks of residential estates, include those directly to the west of the site. In this context the proposal presents a logical location for the continued extension of existing built form which will infill and round of an existing housing estate to the west of the site in order to meet the future housing needs for Barnet.



2.1.6 The site is located within, but at the northern edge of, the Green Belt. An area of the site is locally designated, as a Site of Borough Importance for Nature Conservation, known locally as Glebe Lane Pastures. The site does not contain any other known national, regional or local designated landscape, environmental or ecological features or designations.

2.1.7 While the site does not contain any listed buildings or heritage assets, there are two Grade II Listed buildings within the immediate area. To the north of the site The Brocket (List entry 1078859) fronts onto Barnet Road while to the east of the site is the Church of St Peter (List entry 1078860) which again is located to the south of Barnet Road.

2.1.8 The site is located within Flood Zone 1 and therefore at the lowest risk of flooding.

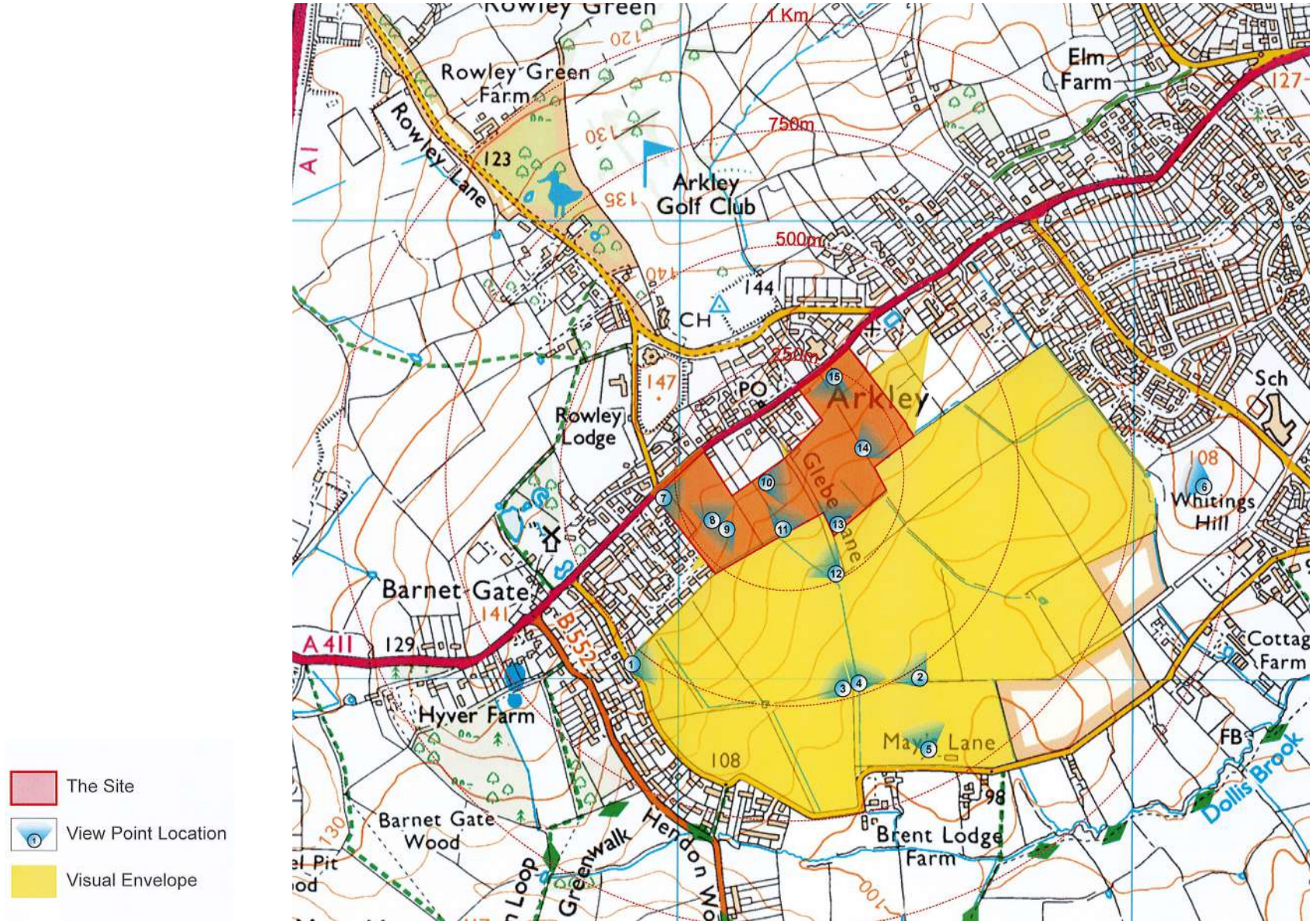
2.1.9 The site benefits from a main northern frontage which adjoins Barnet Road, where the proposed site access would be taken from. The two parcels of land are subdivided by Glebe Lane which centrally dissects the site.

2.2 LOCAL CHARACTER

2.2.1 The local architectural character surrounding the site is mixed, ranging from pre 1900 local vernacular, interwar development to modern residential buildings in various styles ranging from polite modernist to pastiche. Examples are shown opposite



2.3 VISUAL ENVELOPE



2.4 PHOTOS OF AND TO THE SITE



2.4.1 View 1

This is a view looking east, taken from Barnet Gate Lane just to the south of the existing housing through a gap in the existing tree lined hedgerow. The Site is to the left of the view and is screened by the existing housing and vegetation. The Old Elizabethans Cricket Club, to the south of the Site can be seen in the centre of the view.



2.4.2 View 2

This is a view looking north towards the site, taken from beyond the northern edge of the Old Elizabethans Cricket Club grounds. The existing houses to the west of the Site can just be seen to the left of the view and to the right the roofs of houses of Raebarn Gardens. The Site itself is screened by the existing hedgerows and trees but in winter it would be possible to have limited views of any proposed development. Note that none of the buildings on either side of Barnet Road (to the north of the Site) are visible.



2.4.3 View 3

This view is taken looking north west, taken from the western edge of the Old Elizabethans Cricket Club grounds. One can just make out some of the houses on Barnet Gate Lane and Rockways and Wylo Drive (the existing housing estate to the west of the Site). The Site itself is screened by the existing trees and hedgerows but in winter it would be possible to have glimpses of any proposed development.



2.4.4 View 4

This view is taken looking north east, taken from the western edge of the Old Elizabethans Cricket Club grounds. To the right of the view, it is possible to see existing housing associated with Raebarn Gardens. Again, note how the Site is screened by the existing trees and hedgerows and that no properties are visible to the north or south of Barnet Road. In the winter it would be possible to have glimpses of any proposed development.



2.4.5 View 5

This is a view taken looking north towards the site from the south of Old Elizabethans Cricket Club grounds. To the left of the view existing properties off Rockways and Wylo Drive (the existing housing estate to the west of the Site) are visible and through the gap in the cricket ground hedge it is possible to see properties of Saddlers Close. Again the site is screened by the existing hedgerows and trees to the south of the Site but in winter it may be possible to have glimpses of the proposed development.



2.4.6 View 6

This view is taken looking north west, from the high point of Whittings Hill Open Space. To the right of the view are the existing properties of Brett Road with the rooftops visible of the houses beyond. Even at this high elevation the new woodland planting associated with this open space screens the Site. These trees screen all of the properties both north and south of Barnet Road, including St Peter church, but you can see the properties off Saddlers Close.



2.4.7 View 7

This is a view from the north west corner of the Site looking south east across it. This view shows that the existing planting within the Site breaks up any views across it so that only the immediate field is visible. The long-distance view looks across Dollis Brook Valley towards Totteridge village, which can just be made out in the far distance.



2.4.8 View 8

This view is taken from the middle of the western field of the Site looking north. Even from this short range view the existing trees and hedgerows screen existing properties north of Barnet Road and it is just possible to see the larger properties south of Barnet Road above the trees.



2.4.9 View 9

This view is taken from the middle of the western field of the Site looking west towards the existing properties off Wylo Drive. Again even from this very short range view the existing trees and hedgerows brake up a large proportion of the possible views of these existing properties.



2.4.10 View 10

This view is taken from the centre of the Site looking South east. Again this view shows that the existing planting within the Site breaks up any long distance views across it so that only the immediate field is visible.



2.4.11 View 11

This is a view taken from the middle of the site looking north. This view demonstrates that the existing planting and woodland blocks within the Site breakup any possible long-distance views and only the immediate field is visible. The view is looking towards Glebe Lane that separates the Site into west and east. South of the existing housing on Glebe Lane this lane becomes inaccessible and completely overgrown.



2.4.12 View 12

This view is taken from the end of the tree lined Glebe Lane looking north west towards the Site. To the right of the view you can see the existing properties off Wylo Drive. The Site is screened by the existing mature trees and hedgerows and reinforced by the internal woodland block planting.



2.4.13 View 13

This view is taken from the southern most point of the eastern parcel of land of the Site looking north east. Again the internal woodland block planting limits any long distance views however it is just possible to see some of the out buildings associated with the commercial car wash off Barnet Road to the left of the view.



2.4.14 View 14

This is a view from the eastern section of the Site looking east. The existing mature hedgerows and trees associated with the internal woodland block planting minimise any long distance views and are an effective screen to the proposed development both internally and externally.



2.4.15 View 15

This is a view taken just south of Barnet Road from within the eastern parcel of the Site looking south. This view looks across the Dollis Brook Valley to properties in the far distance associated with Totteridge common and village. To the immediate right of the view are the temporary buildings associate with the Car Wash and Car Dealership served by Barnet Road.

3.0 SUSTAINABILITY

3.1 SUSTAINABILITY AND PROXIMITY TO SERVICES

3.1.1 This section assesses the sustainability of the site to clearly state that the site is acceptable and deliverable in planning terms.

3.2 PUBLIC TRANSPORT ACCESSIBILITY

3.2.1 The site has a PTAL score of 1a/1b which is defined as a low level of accessibility to public transport. However, the site is located directly adjacent to bus stops which provide a comprehensive and direct service to close by local town centres.

3.2.2 The nearest bus stops to the site are located at Glebe Lane directly adjacent to the site. Numerous bus services serve the Glebe Lane bus stop offering a variety and immediate service to the local town centres of Chipping Barnet, New Barnet, Edgware and Cockfosters alongside other local centres. Moreover, as evidenced in the table opposite all services are highly frequent, offer a Monday to Sunday service and begin before 6am and end around, or after, midnight.

3.2.3 High Barnet underground station is located approximately 2 miles to the west of the site which is served by a frequent bus service (107, 384) from the bus stop at Glebe Lane directly adjacent to the site with an approximate journey time of 15 minutes. The Station is on the northern line with a service at least every 5 minutes to central London including Kings Cross, Euston, London bridge and Waterloo amongst others.

3.2.4 Elstree and Borehamwood Overland Station is also located approximately 2.5 miles to the west of the site which is also served by a frequent bus service (107) from the site from Glebe Lane bus stop with an approximate journey time of 25 minutes. This station offers a frequent service every 15 minutes into the Centre of London and to St Albans and Rainham in Kent.

Bus Service	Frequency	Destinations
107 (Transport for London)	Monday to Sunday service. Monday to Friday: 06:00 to 20:00 every 15 minutes. Outside of these peak times every half an hour from the first bus at 05:24 to the last bus at 00:45. Saturday: Every 15 minutes 08:00 to 19:00 and every half an hour outside of these hours 05:24 to 00:34. Sunday: Every half an hour 06:29 to 00:34	Chipping Barnet New Barnet Cockfosters Borehamwood Edgware
384 (Transport for London)	Monday to Sunday service. Monday to Saturday: 05:37 to 22:48 every 20 minutes. Outside of these hours every half an hour from first bus at 05:36 to last bus 23:47 Sunday: Every half an hour from first bus at 06:32 to last bus at 22:48.	Edgware Chipping Barnet New Barnet Cockfosters
606 (Transport for London)	Monday to Friday (Schooldays). First Bus 07:22 and Last Bus 07:26 from Glebe Lane. Return journey from Totteridge School first Bus 15:37 and last bus at 15:57.	Totteridge School
614 the commit (uni bus service)	Monday to Saturday Service. Offers an hourly service from the first bus at 08:33 and the last bus at 18:52.	Edgware Chipping Barnet New Barnet Hatfield

3.3 PROXIMITY TO SERVICES

- 3.3.1 The site is located within Arkley village which has a variety of different local services and facilities all within a mile walking distance of the site including a convenience store, local pubs, nursery, golf club and a private swimming pool.
- 3.3.2 Furthermore, the site is conveniently located under 2,000m from Morrisons Superstore to the west of the site at the Sterling Corner junction there are numerous key services including a drycleaners, convenience store and pharmacy located just over 2,000m away on Chesterfield Parade, both of which can be accessed using the pedestrian footway along the northern side of Barnet Road.
- 3.3.3 In addition, due to the site's close physical relationship and direct bus connections with adjoining local town centres of Chipping Barnet, New Barnet, Edgware, Cockfosters and Borehamwood, future residents will also benefit from an excellent level of accessibility to a wide range of services, facilities and employment opportunities within these town centres. Chipping Barnet for instance is accessed in approximately 10 minutes bus journey and New Barnet, Edgware and Borehamwood are all accessed in approximately 20 minutes from the Glebe Lane bus stop approximately 50m from the site. As highlighted in the table below.

Key Local Town Centres	Bus Service	Journey Time (approx)
Chipping Barnet	384, 107	11 Minutes
New Barnet	614, 107, 384	21 Minutes
Edgware	384, 614, 107	17 Minutes
Borehamwood	107	20 Minutes
Cockfosters	107, 384, 614	32 Minutes



- All primary schools state and independent - Barnet
- All secondary schools state and independent - Barnet
- All primary schools state and independent - Hertfordshire
- All secondary schools state and independent - Hertfordshire
- Nursery schools
- Doctor surgeries & health centres
- Retirement and nursing homes/extra care
- Dental practices
- Site Location

3.3.4 To comprehensively demonstrate the site's accessibility to services and facilities and transport connections, the adjoining table provides a summary of some of those key local amenities and facilities available in vicinity of the site, together with the approximate walking, cycling and bus journey times from the site to the facility.

3.3.5 The site is, therefore highly accessible to numerous local services suitable to serve a residential development, available within the immediate vicinity and within close walking and cycling distances. Moreover, the adjoining table highlights that, due to the excellent bus network, the site is closely connected to key local town centres where a wide range of services, facilities and employment opportunities are accessed.

3.3.6 Given the proximity of the above services, the site is considered to be appropriately located for residential development in terms of the local facilities and amenities within suitable walking, cycling and bus distances.

Type	Amenity	Distance (meters)	Walking time (minutes)	Cycle time (minutes)	Bus Time (minutes)
Public Transport	Bus Stop (Glebe Lane)	50	2	-	-
	High Banet Underground Station	3560	44	13	14
	Elstree & Borehamwood	4184	53	17	28
Shops / Services	Qunita Stores	1448	17	6	8
	Morrisons Superstore	1931	24	7	12
	Chipping Barnet High Street (Supermarkets, shops, restaurants, bars etc)	2896	37	11	12
	Chesterfield Parade (Butchers, Convenience store, Dry cleaner)	2253	26	8	11
Healthcare	Barnet Hospital	2414	27	10	11
	Prima Pharmacy	2253	26	8	11
	Arkley Care Home BUPA	300	6	3	-
Leisure	The Arkley Pub	1609	19	6	7
	St Peters Church	300	7	3	-
	The Gate	960	11	4	4
	Arkley Golf Club	960	12	5	-
	Barnet Private Swimming pool	300	7	3	-
	Barnet Gate Sports Ground	380	8	3	-
Education	Whitings Hill Primary School	1930	22	7	9
	Arkleys Little Acorns Nursery	970	12	5	5
	Saffron Green Primary School	2900	35	9	16
	Kenilworth Primary School	3380	42	11	16
	Queen Elizabeth's School	2410	30	13	12
	Leahurst Nurseries	1770	22	7	11

4.0 EXISTING POLICY CONTEXT

4.1 EMERGING NEW BARNET LOCAL PLAN

- 4.1.1 The Local Plan sets out a vision for how Barnet will change as a place over the next 15 years and forms a strategy which emphasises the borough's attractiveness as a place to live, work and visit. The emerging Plan will replace the existing 2012 Local Plan and, once adopted, will form the part of the Development Plan for the determination of future planning applications.
- 4.1.2 The New Local Plan comprises a suite of strategic and development management policies together with its proposals and a policies map. Upon adoption the new Local Plan will replace the Core Strategy and Development Management Policies documents (adopted in 2012).
- 4.1.3 The first draft of the Local Plan was published in January 2020 and the revised draft plan (Regulation 19 version) has now been completed with public consultation currently underway and due to close on 9th August 2021.
- 4.1.4 The London Borough of Barnet are anticipating that the Local Plan will be submitted to the Planning Inspectorate for examination in Autumn 2021.

4.2 DEVELOPMENT PLAN

- 4.2.1 The current Development Plan for the site comprises the Core Strategy and the Development Management policies - both adopted in September 2012 - and the London Plan 2021. The relevant policies, including development needs are summarised on the following pages.

4.3 CORE STRATEGY (SEPTEMBER 2012)

- 4.3.1 Policy CS1 - Barnet's place shaping strategy seeks to concentrate and consolidate housing and economic growth in well located areas that provide opportunities for development.
- 4.3.2 Policy CS3 - Distribution of growth in meeting housing aspirations says that the Council expects in the range of 28,000 new homes to be provided within 2011/12 to 2025/26. Outside of the strategically identified areas designated to provide large scale housing provision the Council identifies town centre locations to provide the focus for enhancement and infill housing development to be delivered through the town centre frameworks.
- 4.3.3 Policy CS5 - Protecting and enhancing Barnet's character to create high quality places seeks to ensure that development in Barnet respects local context and distinctive local character creating places and buildings of high quality design.

4.4 DEVELOPMENT MANAGEMENT POLICIES

- 4.4.1 Policy DM01 - Protecting Barnet's Character and Amenity relates to Core Strategy Policies CS5. It aims to ensure high quality of design of buildings and places within the borough. Proposals for development are expected to meet the following:
- 4.4.2 • Preserve or enhance local character and respect the appearance, scale, mass, height and pattern of surrounding buildings, spaces and streets;
- 4.4.3 • Ensure attractive, safe and, where appropriate, vibrant streets which provide visual interest, particularly at street level and avoid blank walls;
- 4.4.4 • Be designed to allow for adequate daylight, sunlight, privacy and outlook for adjoining and potential occupiers and users; and
- 4.4.5 • Include hard and soft landscaping.

- 4.4.6 Policy DM15 states that development proposals in the Green Belt are required to comply with the NPPF (paragraphs 137 to 151 - 2021 NPPF Version) and development within the Green Belt will be given the same level of protection as is given to Metropolitan Open Land (MOL). Therefore, the construction of new dwellings within the Green Belt or MOL, unless there are very special circumstances, will be inappropriate development.
- 4.4.7 DM16: Biodiversity- states when considering development proposals the council will seek the retention and enhancement, or the creation of biodiversity. Moreover, where development will affect a Site of Importance for Nature Conservation and / or species of importance the council will expect the proposal to meet the requirements of London Plan.

4.5 LONDON PLAN

- 4.5.1 The London Plan was adopted in March 2021. It is the overall strategic plan for London and serves as a blueprint for the future development and sustainable, inclusive growth of the City. The Plan sets out a fully integrated economic, environmental, transport and social framework for development over the next 20-25 years.
- 4.5.2 Policy D2 indicates that the density of development proposals should be proportionate to the site's connectivity and accessibility by walking, cycling and public transport to jobs and services.
- 4.5.3 Policy D3 is an overarching design policy. It requires development to make the best use of land by following a design-led approach that optimises the capacity of sites. Development proposals are expected to enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape.
- 4.5.4 Policy H1 relates to the increasing housing supply. It sets out an ambitious target of delivering almost 66,000 new dwellings per annum across London and requires boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites.
- 4.5.5 Table 4.1 sets out the 10-year targets for net housing completions (2019/20–2028/29) for each local planning authority. For the London Borough of Barnet, the target is to provide some 23,640 new dwellings over the 10-year period.
- 4.5.6 Policy T1 sets out the strategic approach to transport and requires all development to make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.
- 4.5.7 Policy G6 relates to biodiversity and access to nature and states Sites of Importance for Nature Conservation should be protected. Part C states where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:
1. Avoid damaging the significant ecological features of the site

2. Minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
3. Deliver off-site compensation of better biodiversity value.

4.5.8 Part D of Policy G6 states development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

4.6 MATERIAL CONSIDERATIONS

- 4.6.1 The National Planning Policy Framework (NPPF) was revised in July 2021 and is the primary national guidance on planning policy. It is of particular relevance to the site in terms of its clear commitment to boost significantly the supply of housing.
- 4.6.2 The NPPF sets out the Government's intentions to make the planning system more streamline, more accessible, and promote sustainable growth. It comprises the Government's economic, environmental, and social planning policies, with the underlining message being a presumption in favour of sustainable development.
- 4.6.3 The NPPF is clear in its requirement that Local Plans should meet the full, objectively assessed needs for market and affordable housing in the housing market area. The NPPF is also clear that residential development should be assessed within the context of the presumption in favour of sustainable development.
- 4.6.4 Chapter 5 of the framework encourages the delivery of a wide choice of high quality homes. Stating that the key principle of the planning system is to ensure a flexible and responsive supply of housing land is readily available. To achieve this Paragraph 60 states that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward were needed.
- 4.6.5 Paragraph 134 sets out that development that is not well designed should be refused, especially where it fails to reflect local design guidance and the National Design Guide. Significant weight should be given to developments which reflect local design policies and government guidance and / or those that help to raise the standard of design more generally in an area.

4.6.6 National Green Belt policy is also of direct relevance to the site. Land within the Green Belt designation is required to serve five specific purposes as is set out at paragraph 138 of the NPPF. Paragraph 144 of the NPPF relates to the circumstances under which Green Belt boundaries can be altered through the plan led process and states:

"144. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. 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 beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans."

4.6.7 Paragraph 141 of the NPPF outlines that Councils must have fully examined all other reasonable options for meeting its identified need for development to justify changes to the Green Belt boundaries and states what will need to be taken into account before reaching this conclusion:

"141. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

a) makes as much use as possible of suitable brownfield sites and underutilised land;

b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground."

4.7 ANALYSIS ON THE IMPACT ON THE GREEN BELT

4.8 GREEN BELT REVIEW STAGE 1

4.8.1 Prepared in support of the draft Local Plan is the 'London Borough of Barnet Green Belt and Metropolitan Open Land Study – Stage 1 Final Report – November 2018' (Green Belt Review). Paragraphs 1.2 & 1.3 of the Green Belt Review states the following, which outlines the work undertaken within the review and what would be required at stage 2:

"1.2 To date the Stage 1 study has assessed:

- Existing Green Belt land in relation to the five purposes of the Green Belt designation set out in the National Planning Policy Framework 2018 (NPPF) and National Planning Policy Guidance (NPPG), with a view to identifying pockets of land which perform relatively poorly in Green Belt terms.*

- The openness of MOL, with a view to identifying pockets of land which have a lack of openness.*

- The accuracy and robustness of the existing Green Belt and MOL boundaries, as they appear on the Council's local data layer, recommending appropriate minor realignments along alternative permanent and readily recognisable physical features.*

- The potential for the designation of new areas of Green Belt and MOL.*

- The potential to build on the work of the GLA's All London Green Grid and related work within the Borough to enhance the Borough's Green Belt and MOL.*

1.3 The findings of the Stage 1 Report and other relevant evidence will help the Council to define a preferred spatial strategy for growth including the selection and allocation of sites for development and safeguarding within the Plan period. If potential sites are identified within the Green Belt and MOL, further Stage 2 work will be required to assess the potential degree of harm to Green Belt and/or MOL as a result of de-designation and development, to identify alternative Green Belt / MOL boundaries where possible using existing permanent and readily recognisable physical features. This Stage 2 work will help the Council to establish the necessary exceptional circumstances for Green Belt boundary revisions (set out in paragraphs 135, 136 and 137 of the NPPF)."

4.8.2 Stage 1 of the Green Belt Review is only a qualitative assessment of the Green Belt and fails to provide any assessment of the degree of harm which might arise from the de-designation and development of the Green Belt, as this forms Stage 2 of the process.

4.8.3 The Green Belt review has undertaken a qualitative assessment of all areas of the Green Belt in the London Borough of Barnet against the five purposes of the Green Belt Listed under paragraph 138 of the NPPF. The table below shows how the site scored against these five purposes:

Purpose	Assessment
1. To check the unrestricted sprawl of large built up areas.	75% Relatively Strong
2. To prevent neighbouring towns from merging into one another.	Weak
3. To assist in safeguarding the countryside from encroachment	75% Relatively Strong / 25% Strong
4. To preserve the setting and special character of historic towns	
5. To assist urban regeneration by encouraging the recycling of derelict or other urban land	Strong

4.8.4 In relation to purpose 5, the Green Belt review confirms the following at paragraph 2.63:

"The London Borough of Barnet Brownfield Register contains a record of roughly 1,002.5ha of brownfield land within the Borough. Although no registered brownfield land sits within the Borough's MOL, roughly 7ha of the registered brownfield land falls within the Green Belt, leaving roughly 995.5ha within the urbanised area of the Borough. This represents 17.2% of the total urbanised area of the Borough, which is roughly 5,773ha. Given a significant proportion of the Borough's land is brownfield, all Green Belt land within the Borough is considered to make a strong contribution to Green Belt purpose 5."

4.8.5 Therefore, if the Council were to assess all the Green Belt sites to find suitable sites for release, it would be required to discount purpose 5, as all the land in the Green Belt has been weighted the same. Looking at the remaining 4 purposes, the site scores weakly in relation to the purpose of preventing towns from merging into one another. In relation to the remaining 3 purposes, the western side and part of the eastern side of the site scores 'relatively strongly'. It is noted that the eastern side of the site scored strongly on purposes 1 & 3, however, this is the minority of the site and the remaining areas fell below this threshold.

4.8.6 Given that the majority of the site falls outside of the top bracket of 'strong' for all the purposes, it is considered that the site is a good candidate for release from the Green Belt, once the Council undertakes the Stage 2 assessment of the Green Belt review

4.8.7 Our own assessment of how the site performs in relation to the five purposes of the Green Belt is provided on the following page.

4.9 ANALYSIS OF IMPACT ON THE GREEN BELT

4.9.1 This section examines the release of this site from the Green Belt in the context of the five purposes of the Green Belt, as set out in the NPPF.

Purpose of the Green Belt	To check the unrestricted sprawl of large built-up areas
Assessment	<p>The development of the site's would be seen as a logical, confined extension to this part of the settlement of Arkley, which will follow the existing built form of the residential development to the immediate west of the site.</p> <p>The site is bounded to the north, west and east by existing residential development and would therefore present a logical rounding off of the development, which harmonises with its surrounding built environment.</p> <p>The existing dense treeline and hedgerow to the south of the site visually contains the site from the open fields beyond. This strong defensible boundary will ensure the site would not be viewed from its wider open fields to the south and would not appear as unrestricted sprawl but an established part of an existing settlement.</p> <p>The submitted indicative concept plan also shows how areas of public space and landscaping and planting could help further strengthen the landscape buffer to its open fields beyond particularly along its southern and eastern boundary. This would further contain the site from the wider Green Belt located beyond the site.</p> <p>To conclude, the development of this site will not lead to the unrestricted sprawl of a large built-up area as it will be contained within the existing line of the southern extent of Arkley and the extent of the development will not project further into the countryside. Furthermore, by reinforcing and maintaining the landscape buffers which bound the site, the proposals will ensure the site is visually contained from the wider landscape and will also prohibit further expansion.</p>
Conclusion	The release of the site from the Green Belt will not result in the unrestricted sprawl but will act as a logical, confined extension which conforms with existing built lines and pattern of development.

Purpose of the Green Belt	To prevent neighbouring towns merging into one another
Assessment	<p>The closest settlements to the site on its southernly aspect which the Green Belt projects is Totteridge to the Southeast of the site, which is separated from Arkley by 5 miles of unbuilt open land that is also designated as Green Belt.</p> <p>Development of this site will follow the existing southern extent of the settlement along the south of Barnet Road, created by the residential estate of Rockways and Wylo Drive to the west of the site. Development will not therefore extend into the countryside to more of an extent than an existing established built line.</p> <p>The site development should be seen in this context and there will be no merging or coalescence of Arkley with Totteridge as both will remain clear distinct and separate urban areas.</p>
Conclusion	The release of this site from the Green Belt will not lead to the merging of any neighbouring settlement.

Purpose of the Green Belt	To assist in safeguarding the countryside from encroachment
Assessment	<p>The site will result in the loss in a small amount of land within the countryside. However, the Council has categorically failed to demonstrate how it will meet its housing need using the standard methodology and not considered if the use of Green Belt or open countryside is required to meet this need.</p> <p>Whilst the land is open, it is typical of an urban fringe landscape characteristic with the land being used for the grazing of horses. This contrasts with the land to the immediate south of the site which has all the characteristics of open countryside; being in agricultural use and offering wide expansive views to the south of open fields. There is therefore a key landscape transition whereby residential development is more appropriate in the site's urban fringe location compared to the open undulating fields beyond.</p> <p>The proposed residential development in this context will follow an established line of built form and round of the settlement in as sensitive manner while ensuring there is no encroachment further south into the wider open countryside.</p> <p>The site also benefits from further barriers to growth as the site is bordered by residential development from the north, east and west. The reinforcement of the landscape buffer to the south of the site, together with a proposal which maintains existing built lines of the settlement will ensure the Green Belt will be protected from further encroachment in the long term.</p>
Conclusion	The release of this site from the Green Belt will not compromise the purpose of safeguarding the countryside from encroachment, beyond the loss of couple of fields that are viewed in the context of the adjoining urban form.

Purpose of the Green Belt	To preserve the setting and special character of historic towns
Assessment	<p>The site is not located within a conservation area and there are no Listed Buildings located at the site. The settlement of Arkley is identified on the 1986 ordinance survey map, so it is considered a settlement of some historic interest. The housing in the settlement is limited, but it is already clear that the housing is focussed in a linear development along Barnet Road.</p> <p>Map regression analysis of ordinance survey maps from 1920 to 1946 shows that the pattern of the expansion of housing development in Arkley was formed by piecemeal development infilling spaces between the building form and expanding further to the north and south of Barnet Road. Therefore, the proposed development follows the historic pattern of the expansion of Arkley and would preserve the setting and special character of historic towns.</p>
Conclusion	The release of the site from the Green Belt will not compromise the setting or special character of the settlement

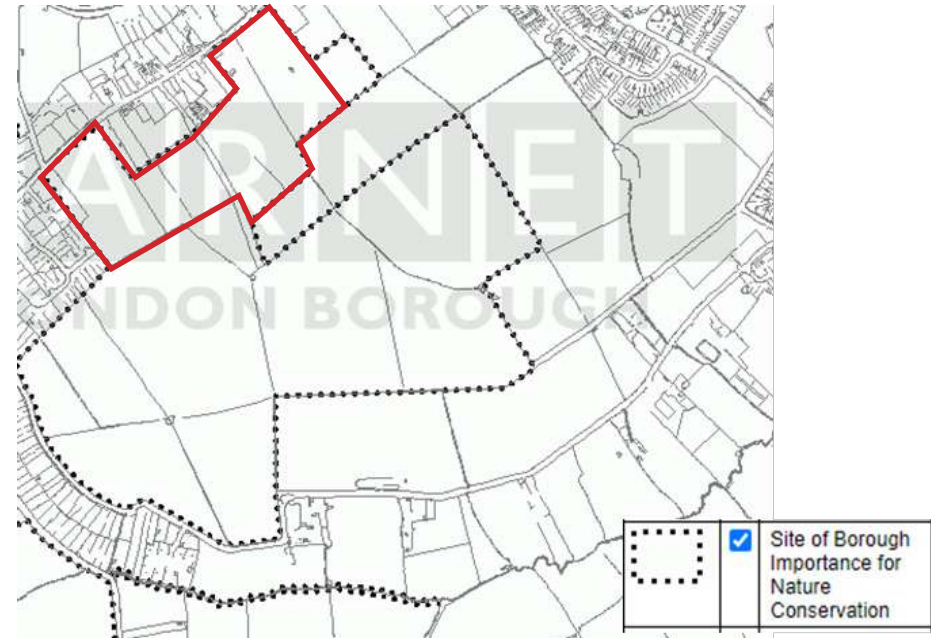
Purpose of the Green Belt	To assist in urban regeneration, by encouraging the recycling of derelict and other urban land
Assessment	Barnet does not have a supply of sufficient derelict land within its boundary to meet its housing need. Even if regard is had from its renewal areas and Barnet's existing urban areas, where housing growth is currently directed, this is not sufficient to meet the housing needs of Barnet during the next plan period. As such given the housing need within the borough and in London as a whole, Green Belt releases are required as part of the solution. Particularly in cases such as this where land does not meet the five criteria to which it is designated.
Conclusion	The release of the site from the Green Belt will not prejudice or prevent the recycling of derelict and other urban land.

4.9.2 It is clear from the above assessment that the release of the site from the Green Belt would not compromise the five purposes of Green Belt land.

5.0 TECHNICAL CONSIDERATIONS

5.1 ECOLOGY

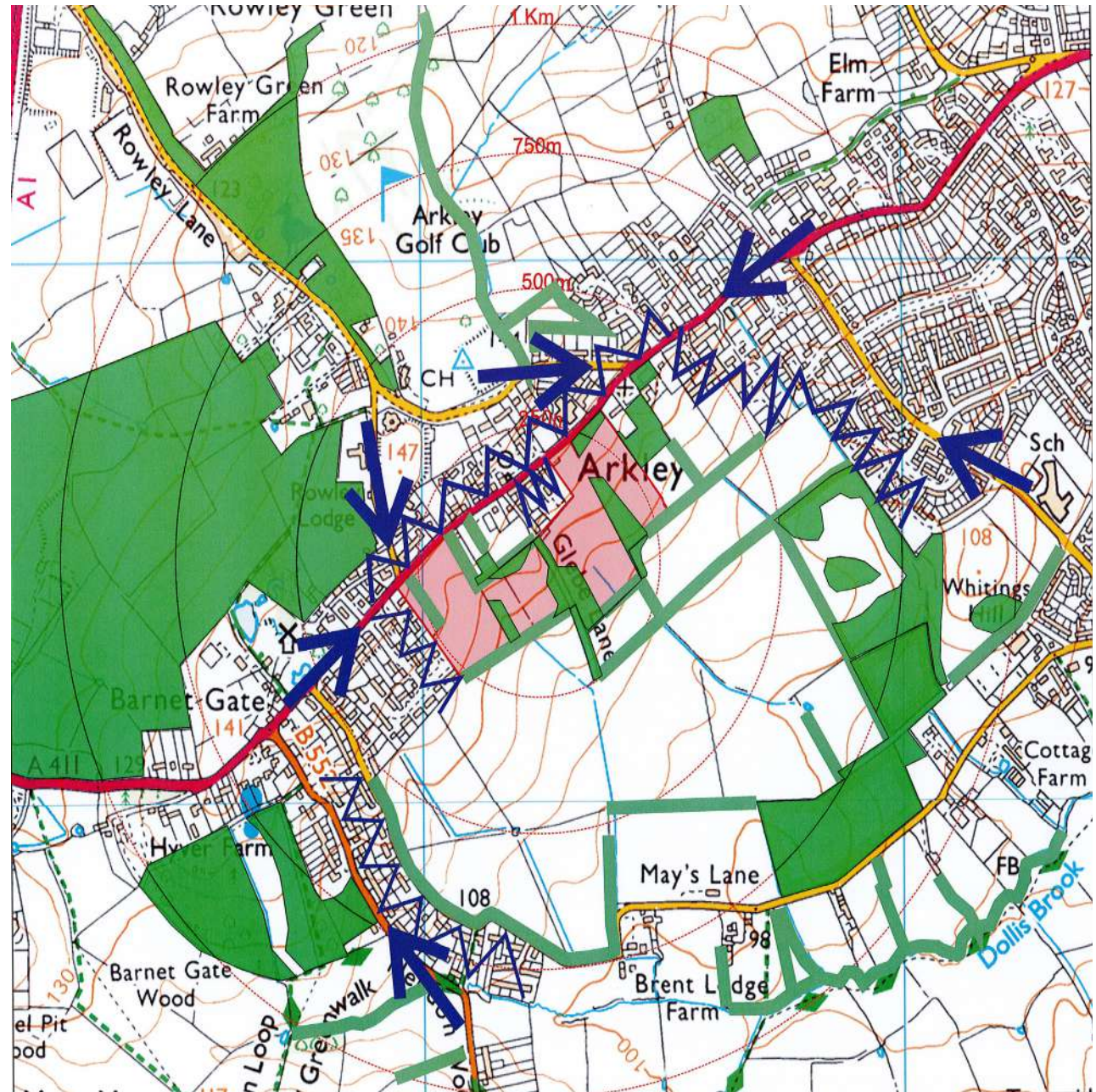
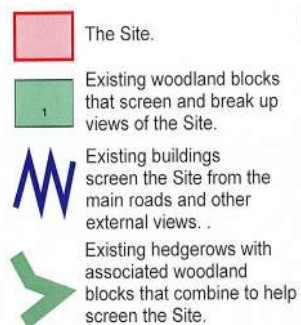
- 5.1.1 A part of the site, as highlighted within the policy map extract below, is identified as a Site of Borough Importance for Nature Conservation which is a non-statutory local designation.
- 5.1.2 Table 17.2 of the Local plan identifies the above area as Glebe Lane Pastures.
- 5.1.3 The London Plan 2021 states that Sites of Importance for Nature Conservation should be protected but does not prohibit residential development. Policy G6 of the London Plan states where residential development would cause unavoidable harm to a Site of Borough Importance for Nature Conservation and the benefits outweigh the impacts on biodiversity, mitigation is required to minimise development impacts by:
1. avoiding damaging the significant ecological features of the site
 2. minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
 3. deliver off-site compensation of better biodiversity value.
- 5.1.4 In this context further ecological surveys will be undertaken to fully determine the ecological opportunities and the constraints of the development site. The current development proposal has sought to ensure the retention of the key woodland and ecological areas, to ensure no damage to significant ecological features would occur. Any future planning application would be supported by detailed ecological enhancement proposals to ensure the quality and management of the retained ecological area would be improved as part of the development.



5.2 LANDSCAPE AND VISUAL

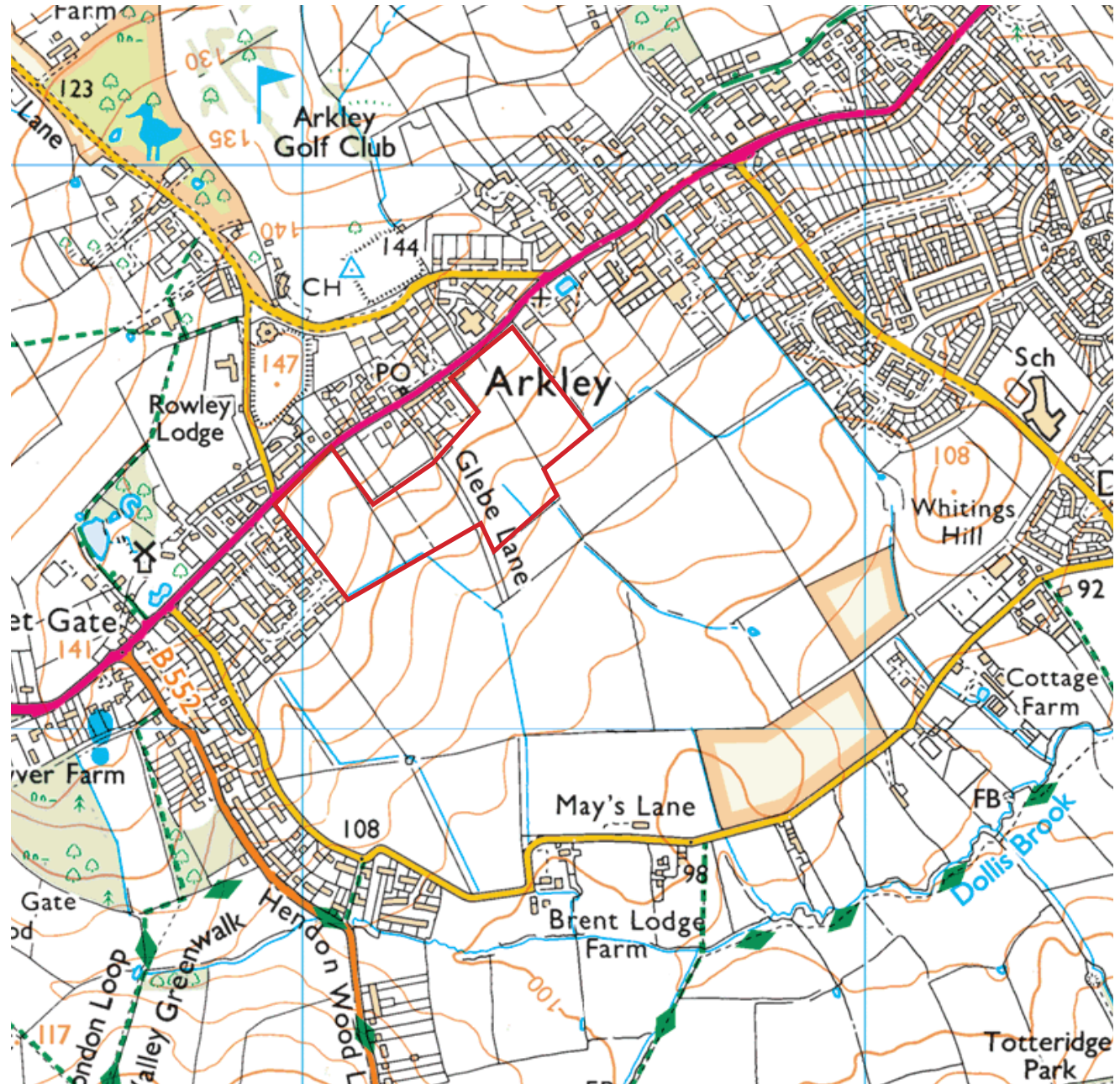
5.2.1 A full Landscape and Visual Assessment will be undertaken as part of any future application. However, a preliminary assessment of the site highlights that:

1. The site is not included in any designations specific to landscape and visual matters.
2. The site is typical of an urban fringe location with pastoral land being used for the grazing of horses and the site has strong defensible landscape buffers on the boundary of the site through dense treeline and hedgerows. The site is thereby visually contained and is in contrast to the landscape character to the south of the site which consist of large undulating agricultural open fields.
3. The land is not readily visible from wider views in the urban areas to the north, east to west, with the main landscape interest being from the south, which is the wider Green Belt land;
4. The images taken from the land to the south (views 2,4,5 and 12) shows that the sloping topography of the land from north to south and the dense foliage on the southern boundary of the site would limit any views of the development from the wider open countryside;
5. The site is also visually influenced by the settlement of Arkley where residential development surrounds the site from the north, east and west. The site in this context, will continue this established built form and provide a logical extension to the existing built lines and built form of the housing estate to the west of the site. The proposal will therefore be read as a natural extension of Arkleys settlement rather than cause visual landscape harm.



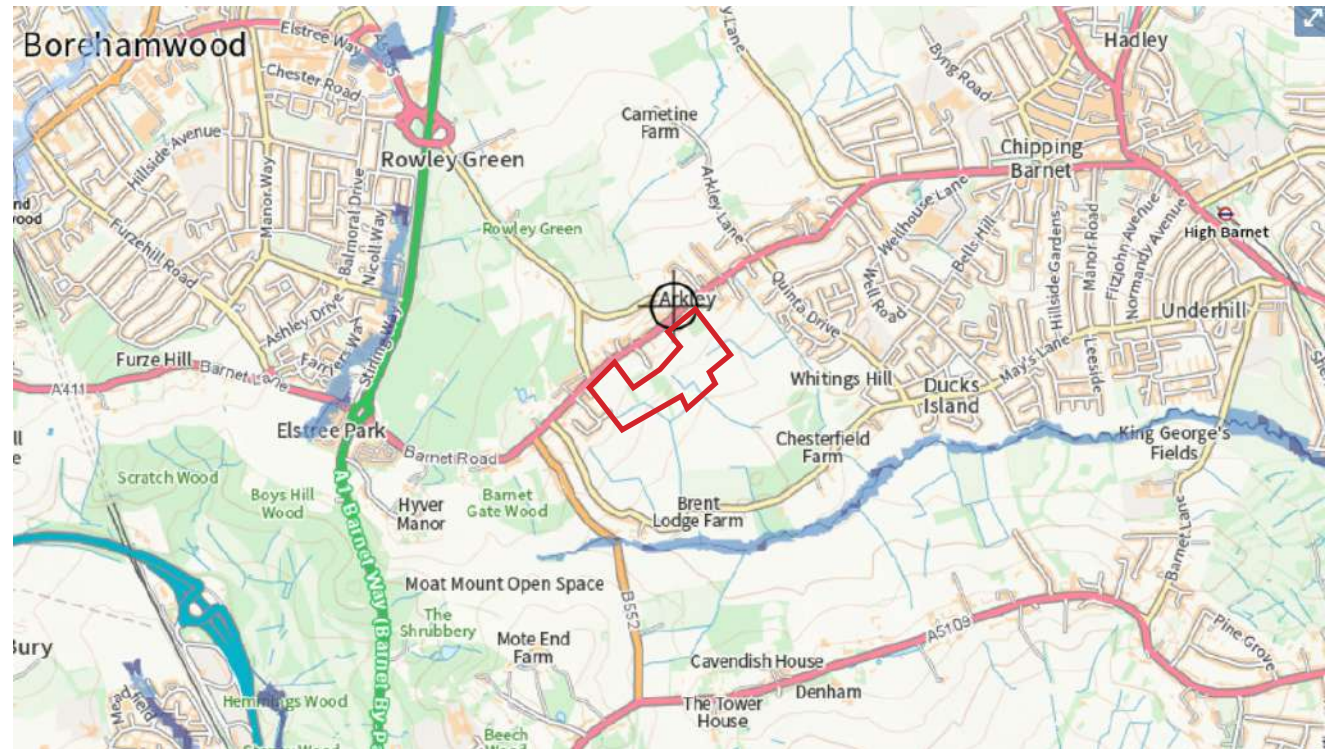
5.3 HIGHWAYS

- 5.3.1 Strykeslip were instructed to provide highways and transport advice in relation to a residential development at the site and to determine key highway considerations and subsequent findings to inform the development proposal.
- 5.3.2 Because of the size of the site and the fact the site is effectively split into two parcels of land to the eastern and western sites by Glebe lane, it was advised that two separate accesses are required for both plots.
- 5.3.3 The eastern access land be located at the mid-point between BUPA existing access road and the adjacent access next along to the west. A simple priority junction with diverging and merging tapers is deemed appropriate subject to TRICS based trip generation whereby in a 'worse case' scenario a centrally located ghost island would need to be provided.
- 5.3.4 For the western site access it was advised that the preferred access is located to the western edge of the site as shown in the preliminary concept plan. Like the eastern access a simple priority junction with diverging and merging tapers is deemed appropriate, subject to TRICS assessment and its findings in terms of the potential need to lengthen diverging and merging tapers or introduce a ghost island.
- 5.3.5 Subject to further assessments and resulting refinements and further modifications exercise the two access points required are both safe and suitable for the proposed large scale residential development.



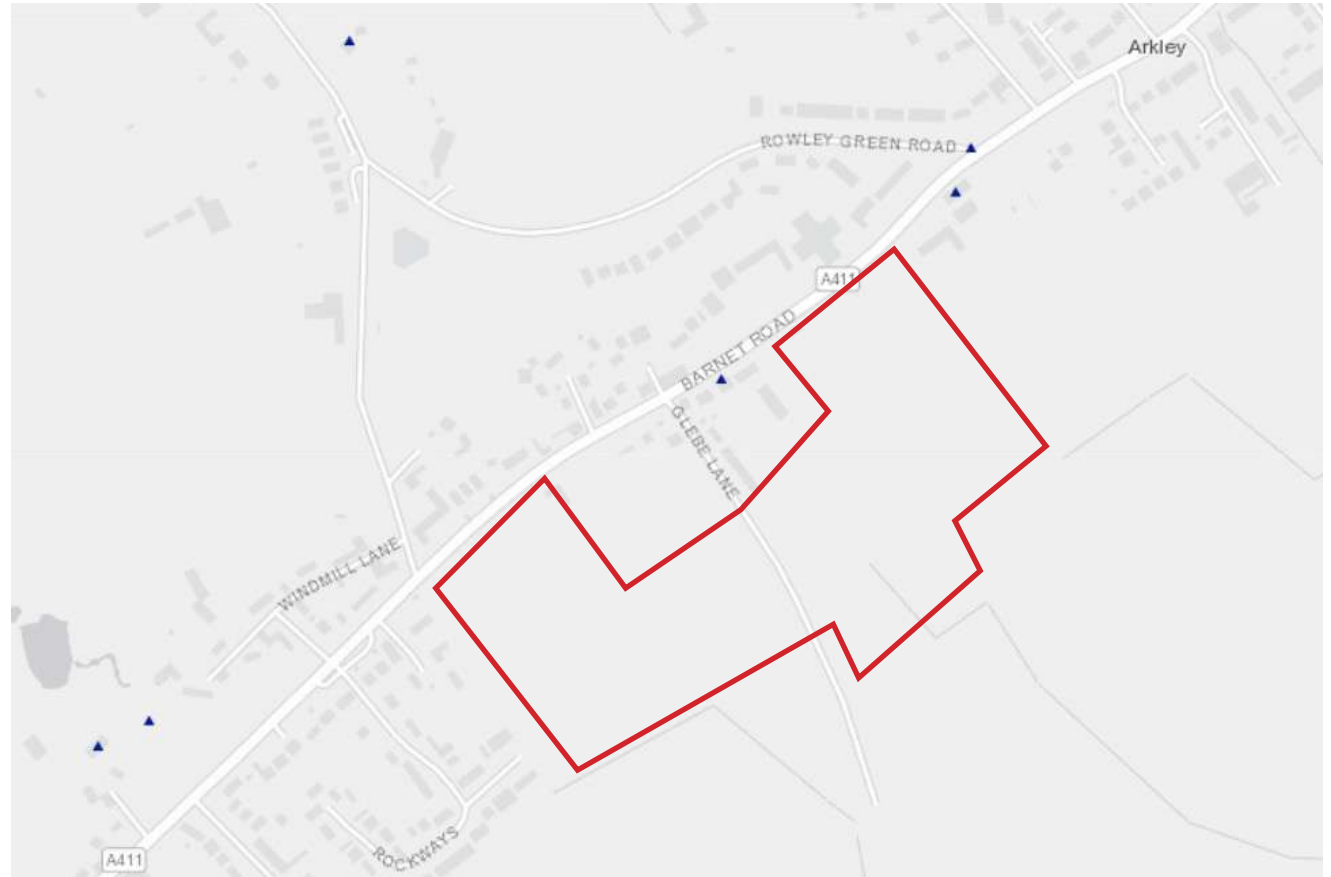
5.4 FLOODING

- 5.4.1 The site is located within Flood Zone 1 (low probability) and is located outside of the fluvial and tidal flood zone risk. The site is therefore sequentially acceptable for development.
- 5.4.2 No other known sources of flooding have been identified for the proposed site, including flooding from groundwater flooding, existing sewers and artificial sources.



5.5 HERITAGE

- 5.5.1 The site is not located within a conservation area and there are no Listed Buildings or heritage assets within the site. The site is located adjacent to two Grade II Listed heritage assets named the Bocket and the Church of St Peter as shown in the map below.
- 5.5.2 While both Listed Buildings are located adjacent to the site, both are not readily visible due to being enclosed by residential development or through dense hedgerow and treelines which borders the site. Through appropriate design the proposal will assimilate with the existing built form and lines of the village and will therefore not harm the setting of these listed buildings.



5.6 TREES

5.6.1 There are no areas of designated ancient woodland at the site. A preliminary arboricultural appraisal will be produced to inform the appraisal, however it is proposed that the existing hedgerows and treeline boundary treatment will be maintained and enhanced and any trees of defined high quality within the centre of the site can be incorporated as part of any future evolution of the masterplan.

Woodland blocks identified in yellow hatch



6.0 CONCEPT PROPOSALS

6.1 CONSTRAINTS AND OPPORTUNITY

6.1.1 The drawing below illustrates the key constraints and opportunities on the site.

1. Entrance to western site from Barnet Road
2. Entrance to eastern site from Barnet Road
3. Private road Glebe Lane bisecting the two sites
4. Views from surrounding properties
5. Listed building
6. Existing woodland blocks/green space



6.2 FRAMEWORK AND CONCEPT LAYOUT

Working alongside the scheme architects, RG+P an illustrative development layout plan has been prepared to show how the site could be developed upon allocation within the Local Plan, with a copy of this plan provided below.

- 6.2.1 The development layout plan has been informed by survey work undertaken by an ecologist and landscape consultants, the findings of which are identified in this document. The key principles established from this work is the need to ensure the retention of woodland blocks that are within and adjoining the boundaries of the site. Another key principle is the need to ensure the site continues to benefit from mature vegetation along the southern boundary line of the site, to enable the development to be effectively screened from the south.
- 6.2.2 The concept plan shows the potential development parcels within the site, with areas of green and open space provided, along with areas for the provision of suitable drainage attenuation. Based on a development density of 30 dwelling per hectare, the site would achieve a total of 207 dwellings. This would equate to 100 dwellings to the east of Glebe Lane and 107 dwellings to the west of Glebe Lane.
- 6.2.3 The development layout plan also demonstrates how the proposals would:
1. Provide separate vehicular into the western and eastern parcels via Barnet Road;
 2. Include for the creation of safe pedestrian crossing points across Barnet Road from the southern to northern side of the carriageway.
 3. Retain and reinforce hedgerows and treelines to provide a landscape buffer which protects the amenity of residential properties along the northern boundary fronting onto Barnet Road and the cottages along Glebe Lane;
 4. Allow for landscape and amenity zone on the western boundary, that would protect the amenity of adjacent houses within the housing estates of Rockways and Wylo Drive and provide further public open space for the adjoining community; and
 5. Retain the existing areas of trees within the site.

6.3 FRAMEWORK LAYOUT PLAN CONCLUSION



6.4 CONCLUSION

6.4.1 This vision document has been prepared to demonstrate the availability and deliverability of a residential development at the site during the early years of the next plan period. The consultation response prepared by Simply Planning to the Regulation 19 draft Local Plan consultations outlines, in detail, our case that the Local Planning Authority is substantially failing to ensure that the Council's identified housing need will be met during the next plan period.

6.4.2 The site is currently situated within the Green Belt, but it is our belief that the Local Planning Authority will be required to undertake a full assessment of the Green Belt to determine if any sites could be released to ensure its housing need can be met. The assessment and analysis work undertaken within this document has determined that the removal of the site from the Green Belt would not conflict with any of the five purposes of the Green Belt, as outlined in paragraph 138 of the NPPF. A residential development at the site would:

- Not result in the unrestricted sprawl of large built-up area, as the site forms an infill adjoining the existing urban form of Arkley, which itself cannot be considered a 'large built-up area';
- Not result in the neighbouring towns merging into one another, as no settlement is located in near proximity to the south of the site, ensuring no coalescence between settlements would occur;
- Assist in safeguarding the countryside from encroachment, by infilling existing fields and not spreading the urban form of Arkley materially further south into the open countryside than the adjoining residential estates;
- Preserve the setting and special character of historic towns, as the patterns of infill development follows the established historic approach to expansion within the town;
- Assist in urban regeneration, as the London Plan and draft Local Plan fail to meet the identified housing need for the Borough and this need cannot be met using brownfield sites alone.

6.4.3 The Council's own Green Belt assessment has determined that the site scores poorly against the above five purposes of Green Belt land. The remainder of the document has established that the site is free from any technical constraint that could not be suitably mitigated against by a well designed development, that preserves the existing woodland and ecological areas, whilst providing much needed new houses for the local community. We consider that the site is deliverable, viable and available for development within the first five years of the plan period, which will help to address the Council's inability to demonstrate a five year supply of available sites for housing. Therefore, we consider that the Local Planning Authority needs to wholly reconsider its approach to meeting its identified housing need, including a full review of Green Belt sites that can be released for housing. The technical work provided within this document demonstrates that this site is one of the most suitable for release from the Green Belt and should be considered for release accordingly by the Local Planning Authority

