



## Note

# LB BARNET LOCAL PLAN EXAMINATION WRITTEN STATEMENT (ID058) - MATTER 10

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## 1 Introduction

- 1.1 This Written Statement has been prepared by Quod on behalf of Hammerson UK Properties plc and abrdrn (“H/abrdrn”) in response to questions raised under Matter 10 “Site Allocations” within the Inspectors’ Matters, Issues & Questions (“MIQs”) in respect of London Borough of Barnet’s (“LBB”) Draft Local Plan Examination in Public (“EiP”)
- 1.2 H/abrdrn are the long leaseholders of Brent Cross Shopping Centre and surrounding land, and have been working with LBB and key stakeholders over the last two decades to facilitate its revitalisation as part of the wider Brent Cross Growth Area.
- 1.3 Owing to economic uncertainties in the retail market, H/abrdrn took the decision to delay the delivery of Phase 1A (North) and Phase 1B (North) of the 2014 Planning Permission. Although originally hoped that this delay would be temporary, the changes that have occurred are so significant that it calls into question the appropriateness of a retail led development north of the A406.
- 1.4 H/abrdrn remain committed to enhancing the existing Shopping Centre and redeveloping the surrounding land as part of a new Metropolitan Town Centre, and are evaluating the conceptual changes to the retail market and the role of town centres in the context of Brent Cross. H/Abrdrn welcome the opportunity to take this work forward in collaboration with the Council, the other development partners and key stakeholders.
- 1.5 For the reasons expressed in response to the relevant questions below and those identified within the Written Statements relating to Matters 2, 4, 6 and 11 H/abrdrn maintain their view that as currently drafted the Draft Local Plan is technically unsound and requires additional modifications as proposed.

## 2 Response to Questions

- 2.1 This Written Statement is submitted in response to the following Matter 10 Questions:

*Issue:*

*Whether the proposed allocation of sites in the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan?*

*Questions:*

*The following questions link to the request in the Inspectors letter of 18 May 2022 for further work to be completed by not later than 23 August 2022, including the production of a technical paper relating specifically to the sites in strategic policies (Policies BSS01 and GSS01 to GSS13) and the proposed allocation of sites listed in Annex 1 of the Plan. The Council is requested to draw upon and cross refer to that evidence as appropriate when addressing the following questions. For sites where specific representations have been made, the Council is*



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*also requested to respond to the particular issues raised. In doing this any updated information regarding site capacities, planning permissions, sites under construction and existing uses should be included.*

- 1) Are the proposed site allocations appropriate and justified in the light of potential constraints, infrastructure requirements and adverse impacts?*
- 2) Is there any risk that any infrastructure requirements, site conditions and/or constraints might prevent or delay development or adversely affect viability and delivery?*
- 3) Are the site allocation boundaries justified?*
- 4) Are the assumptions regarding the capacity of the sites in terms of density of development and net developable areas justified and what is this based on?*
- 5) What is the expected timescale for development in terms of lead in times and annual delivery rates, and are these assumptions realistic and supported by evidence?*
- 6) Does the Plan sufficiently make clear the infrastructure requirements for each of the allocated sites, together with the timing of and dependencies upon such infrastructure for their delivery?*
- 7) Are the proposed allocations and the associated development requirements and principles identified in Annex 1 of the Plan - justified, effective, consistent with national policy and in general conformity with the London Plan?*
- 8) Are any further modifications required to ensure that the relevant policies for each site and/or their development requirements identified in Annex 1 are accurate and sound?*

## Response to Questions

- 2.2** H/abrdrn are supportive of the Council's general approach to development within the Brent Cross Growth Area and Brent Cross North in particular.
- 2.3** However, Draft Policy BSS01 sets out a spatial strategy for the Borough predicated on delivering a specific scale of retail floorspace consistent with that forecast prior to the well documented changes to the retail sector.
- 2.4** The key Draft Local Plan retail evidence base is the Barnet Town Centres Floorspace Needs Assessment 2017 which H/abrdrn do not consider is the reflective of the current retail market, including their own decision to delay delivery.
- 2.5** H/abrdrn do not consider that the inclusion of the retail floorspace figure in Policy BSS01 is 'justified' or appropriate. As currently drafted, the draft policy is unsound and inconsistent with the provisions of the National Planning Policy Framework ("NPPF") 2021 paragraphs 31 and 35.
- 2.6** Also, the proposed modification to Draft Policy BSS01 is factually incorrect as the 56,600sqm of additional comparison retail floorspace as approved under the 2014 Planning Permission relates to Brent Cross North.



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- 2.7 The retail figure should be deleted from Draft Policy BSS01 and replaced with wording which supports the creation of a vibrant and sustainable retail, leisure and mixed use Metropolitan Town Centre at Brent Cross North.
- 2.8 The matters relating to Draft Policy GSS02 and the suggested amendments for soundness are dealt with in detail in the Written Statements relating to Matters 2, 4 and 6 and are summarised here:
- Despite clear evidence to the contrary Draft Policy GSS02 and its supporting text continues to focus on retail led growth despite at Brent Cross North. This is not justified and the text should be amended as proposed; and
  - The purpose of the new planning framework for the Growth Area to provide further guidance for development and its intended adoption date of 2024, H/abrdn question the prescriptive nature of Draft Policy GSS02 particularly with regards to items of infrastructure to be delivered and do not consider this to be consistent with national policy and suggest amendments.
  - The Draft Local Plan is not consistent with Paragraph 16 of the NPPF as there is ambiguity as to whether the new planning framework for the Growth Area is to be prepared. There are also naming inconsistencies which need to be addressed.
  - The draft text in Draft Policy GSS02 relating to the approach to infrastructure funding is still inconsistent with the statutory tests and the provisions of the NPPF and needs to be amended.