

## Barnet Local Plan Examination

### Matter 2: Spatial Strategy and Strategic Policies

**3) Is the Plan consistent with the Framework which expects strategic policies to look ahead over a minimum 15-year period from adoption? If not, would the Plan period of 2021 to 2036 otherwise be justified?**

We note paragraph 3.3.1 of the Local Plan. This observes that over the Plan period to 2036. It should be clarified that if the Plan commences in 2021. If so, then the Local Plan will operate over a period of 15 years.

We note that the Council will seek to deliver a minimum of 35,460 new homes equal to 2,364 new homes per annum over 15 years. This aligns with the annual figure for Barnet set by the London Plan of 2,364 homes per year. We note the modification to the Local Plan (MM25) that identifies a potential capacity for 44,000 homes.

**4) Are the strategic requirements of the Plan as set out in Policy BSS01 intended to correlate with the London Plan when having regard to the approach to spatial development strategies in the Framework? If so, is the Plan's approach to housing, employment, retail, leisure and other commercial development respectively - positively prepared, justified and consistent with national policy?**

Policy BSS01 is not entirely in conformity with the London Plan. We are concerned that development opportunities, especially the supply of small residential sites, is too constrained by seeking to focus housing development in the Opportunity Areas and Growth Areas generally located towards the west of the borough. Very little is allocated in the east despite the good tube connections. We support the change to BSS01C - MM21 – by substituting the word identified for recognised. However, it is unclear if there are any identified housing sites to support delivery in the east. The London Plan places great emphasis on supporting small site developments on sites of 0.25 hectares in size or less as a key element of meeting London's housing needs.

London Plan Policy H2 establishes the requirements to support small site delivery. Among other things, London Plan Policy H2A 2) requires the London boroughs to

*diversify the sources, locations, type and mix of housing supply*

London Plan Policy H2B 3) also requires the boroughs to:

*identify and allocate appropriate small sites for residential development*

Supporting paragraph 4.2.2 explains the benefits of small sites supply, including:

- diversifying the sources, locations, type and mix of housing supply and the type of sites available in addition to large brownfield sites
- increasing housing provision in accessible parts of outer London to help address the substantial housing need in these areas and deliver market homes in more affordable price brackets

We note from the Key Diagram that there are very large parts of the borough that are not served by any development zones. This is true of the quadrant bordered by the tube stations Golders Green, East Finchley, Hendon Central, and Mill Hill East. Also, the area west of

New Southgate to North Finchley. Also, it is unclear if there are any substantial allocations around the Northern Line tube chain from High Barnet down to Highgate. Map 1 in the Local Plan shows that this chain on tube stations have very high PTAL levels. This seems unjustified given the emphasis in the London Plan on diversifying the supply of small sites and supporting development in areas close to public transport hubs.

We consider it unjustified to fail to allocate residential development sites in these areas.

We have considered the brownfield register for 2020 but the geography of most of the entries is unfamiliar to us. It is unclear if there are sites included in this list that could be allocated to the east of the borough.

We have considered the Site Selection Background Report, December 2019. Again, the location of some of the entries in appendix 2 – a list of sites considered deliverable and developable - is not entirely certain, but there are entries for sites in places like East and West Finchley and Totteridge – sites that could have been allocated and some which appear to be located in district centres and in proximity to tube stations.

The Five-Year Housing Land supply report, at appendix 2, does provide a breakdown by ward. There do appear to be some allocations in areas to the east of the borough. For example, there are 1232 homes allocated on various sites in Totteridge. Even so, small site allocations seem sparse, and it is uncertain to what extent there are allocations in the later years of the plan.

The Council should amend the local plan to make the locations around the tube stations growth-type areas deemed suitable for residential development.

**5) Is the spatial strategy for the Borough and the overall distribution of development proposed in the Plan as set out in Policy BSS01 based on relevant and up-to-date evidence and would it promote a sustainable pattern and scale of development in accordance with national policy and in general conformity with the London Plan?**

In part, yes. We appreciate the focus on the Opportunity Areas and Growth Areas, but the shortage of residential allocations to the east of the borough to take advantage of the good public transport connections available there is unjustified. Policy H2A 2) of the London Plan seeks to:

2) diversify the sources, locations, type and mix of housing supply.

**6) Is the approach of strategic policies relating to the spatial distribution of development, positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan? In those respects:**

**a) What is the basis for the calculation and identified distribution of housing and employment growth as set out in Policy GSS01 in terms of Growth Areas (Policies GSS02 to GSS07), District Town Centres (Policy GSS08), areas of Existing and Major New Public Transport Infrastructure (Policy GSS09), areas of Estate Renewal and Infill (Policy GSS10), Major thoroughfares (Policy GSS11) and Redevelopment of Car Parks (Policy GSS12)?**

**POLICY GSS01 Delivering Sustainable Growth**

As we have argued in our representation aspects of the policy are unsound because they are contrary to the London Plan. The Council, through Policy GSS01

### Town centre boundaries

For town centres we note in Annex 1 that this category is defined in paragraph 16.6.1 (page 286) in the following way:

*Boundaries of Town Centres were established in 2012 and have not been changed. Town centre sites are included as those that are within 400 metres of a Town Centre boundary*

This is contrary to the London Plan which wishes to encourage more housing supply, especially of small sites, where these are within 800m of the town centre boundary. London Plan policy H1, in seeking to improve housing supply, wishes to:

*'optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:*

*a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary.'*

The Council is drawing the net too tightly around its town centres, thereby limiting the potential capacity for new homes, or making it more difficult for an applicant to secure a planning permission on infill sites. Unless we have misunderstood the Council's approach, the Council should set the parameters more widely, reflecting the London Plan recommendation of 800m around transport nodes.

### Major Public Transport Infrastructure

Similarly, we note in Annex 1 that this category is defined in paragraph 16.10.1 as:

*"Major Public Transport Infrastructure sites are identified as within 400 metres of an existing or new public transport hub and which have not otherwise been identified as within Growth Areas, Town Centres or Major Thoroughfares."*

We note, however, that the London Plan policy H1, in seeking to improve housing supply, wishes to:

*'optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:*

*a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary.'*

The Council is drawing the net too tightly around important public transport hubs, thereby limiting potential residential capacity, or making it more difficult to secure a planning permission on infill sites. Unless we have misunderstood the Council's approach, the Council should set the parameters more widely, reflecting the London Plan recommendation of 800m around transport nodes.

Five-year housing land supply

The Five-Year Land Supply provides a partial breakdown of where land for housing is allocated. This is helpful to an extent, but it is unclear to what extent the residential sites listed are the result of conscious planning by the Council or they have come forward as windfall. Windfall supply is helpful, but it cannot replace planned supply. Windfall supply can struggle to secure approval because it may have to work against the grain of local planning policy, especially if the local plan is unclear about what is acceptable outside of identified allocations.

***b) Is such an approach in seeking to guide and deliver development to the aforementioned areas, appropriate and justified?***

We appreciate the wish of the Council to use its local plan to promote the chief regeneration opportunities in the borough. However, the scarcity of allocations in other parts of the borough, as a consequence in part of the Council's decision to draw tighter boundaries around town centres and public transport nodes, would militate against the objectives of the London Plan to encourage greater small site supply across more diverse parts of London, especially those areas enjoying good public transport connections.

***c) To what extent is the development sought in the strategic policies consistent with the allocations in Annex 1?***

***d) If the allocations do not fully meet the identified distribution of housing or employment growth in the areas referred to in Policies GSS01 to GSS12, does the Plan provide sufficient certainty as to how they would otherwise be delivered?***

It is unclear to us how the Council would rectify a potential undersupply in housing should delivery falter in any of the Opportunity and Growth Areas. To help avoid this, the Council should allocate land sufficient to support its small sites target of 4,340 homes (or 434dpa) on sites of 0.25 ha or less. If this is not feasible, it should identify small sites of 1 ha or less, in line with national policy, to deliver 10% of its housing requirement – i.e. 3,546 based on the London Plan target of 35,460. It would appear that the Council currently relies solely on a windfall allowance for small site delivery (340dpa).

We recognise that this is a time intensive task for the Council, but the delivery of the London Plan housing targets depends to a large degree on encouraging the development of small sites across all areas of London, including in suburban areas, not only regeneration areas and district centres.

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