

## LB Barnet Local Plan EiP – Matter 2 (Representor ID: ID094)

**Subject** Responses to Inspectors MIQs (LB Barnet Local Plan Examination)  
**Initiator** Knight Frank (on behalf of Mill Hill Missionaries)  
**Date** 23 August 2022

### **MATTER 2 QUESTION 17**

***Did the methodology applied to site selection and the focus for growth in the spatial strategy take full account of flood risk and apply a sequential, risk-based approach to the location of development? In particular:***

- a) Is there sufficient evidence to support the Plan approach that there are no reasonably available sites in areas at lowest risk of flooding so as to justify the allocation of sites in areas known to be at higher risk either now or in the future from any form of flooding (i.e. those identified in Flood Zones 2 and 3)?***
- b) Are the Council's proposed modifications to explain how the Sequential Test has influenced the Spatial Strategy sufficient to achieve soundness or would further changes to the Plan be required?***

Note that the site referenced below is Land East of Lawrence Street, Mill Hill (Landowner: Mill Hill Missionaries) and our intention is to provide helpful feedback to help create a sound Local Plan. Representations to promote the site for residential development have previously been submitted (Representor ID: ID094).

We suggest that the methodology applied to site selection in respect of flood risk should consider the potential for the site to be able to come forward (for residential development) that supports the delivery of flood alleviation / surface water drainage proposals.

Figure E3-5 Mill Hill Circus Preferred Option Locations (of the Surface Water Management Plan Volume 2 – Appendices) highlights potential flooding proposals for the site. This document forms the existing Local Plan evidence base and is not recognised in the emerging Local Plan. We consider that this omission should be reviewed (especially in respect of our recent discussions with the Council summarised below).

Within the last c. 6 months we have been talking to LB Barnet Property Team in respect of potential flood alleviation / surface water drainage proposals at the site. The Council has prepared draft plans and our team is currently assessing these proposals, alongside liaising with the Environmental Agency. A surface water solution for the site / area is required, and we seek to work with the Council (Property, Planning) to agree a deliverable outcome that would benefit the wider Mill Hill Circus area.

We suggest that residential development at the site could help deliver these flooding mitigation proposals and ensure a long term sustainable and resilient solution. The proposals set out in the Local Plan evidence base are on third party land and therefore the Council needs to work in collaborative manner with Mill Hill Missionaries (the landowner) in order to deliver a possible strategic solution for the area.

It is not clear whether the plan-makers have taken the above approach into account as part of the preparation of the Local Plan.

This approach would help support the plan be positively prepared, justified and effective in respect of soundness.