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**Barnet Local Plan
Examination
Response to Matter 3: Meeting
the Borough's Housing Needs**

Taylor Wimpey Strategic Land

19 August 2022

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Contents

1.0	Introduction	1
2.0	Response to Inspector's Questions	2

1.0 Introduction

- 1.1 This statement to Matter 3 (Meeting the Borough’s Housing Needs) of the examination of the Barnet Local Plan (‘the Plan’) is submitted by Lichfields on behalf of Taylor Wimpey Strategic Land (TWSL). It follows the submission of representations to the Regulation 19 Draft Local Plan (June-August 2021).
- 1.2 The National Planning Policy Framework (‘NPPF’) outlines that during the examination process a Local Plan must demonstrate that it has been positively prepared, is justified, is effective and is consistent with national policy. Outlined below are responses to a select number of the Inspector’s questions which set out why we consider changes to Barnet Local Plan are necessary to ensure the soundness of the Plan.
- 1.3 The Council has prepared a schedule of proposed minor modifications that it wishes to make to the Plan. Reference is therefore made to the policies and paragraphs within the Plan version incorporating the schedule of minor modifications, unless otherwise stated.

2.0 **Response to Inspector's Questions**

Question 6: Policy H2 of the London Plan, amongst other things, sets out that boroughs should identify and allocate appropriate small sites (defined as below 0.25 hectares in size) for residential development. Would the proportion of housing anticipated to come forward on small sites in the Borough provide a genuinely plan-led approach to meeting the requirements of the London Plan?

- 2.1 The Draft Local Plan identifies a housing need for Barnet of 35,460 new homes (2,364 per annum, London Plan 2021 target) over the Plan Period from 2021 up to 2036, while providing a supply of sites for up to 44,000 new homes (3,134 per annum). Policy GSS01 and Table 5 set out how the housing targets will be met.
- 2.2 The strategy outlined in Policy GSS01 and Table 5 is not sound as it is over reliant on large and complex urban regeneration sites, and is not compliant with London Plan Policy H2 with regard to small sites. The over-reliance on large sites is explored separately in response to Matter 2 Question 6.
- 2.3 The proposed strategy for meeting housing need is not sound as it is not consistent with London Plan Policy H2 and the strategic priority of increasing housing delivery from small sites. Only 5,100 of 46,000 new homes in the plan period are to be delivered through small sites. The London Plan (Table 4.2) sets out a target for Barnet of 4,340 net housing completions on small sites within ten years. If this figure is extrapolated at 434dpa for the plan period, at least 6,510 homes should be planned for on small sites in the new Local Plan.
- 2.4 The plan therefore fails to meet the London Plan's target for net housing completions on small sites and some small to medium size sites should be allocated, rather than a reliance on windfalls. This is not compliant with London Plan Policy H2, which states that boroughs should pro-actively support well-designed new homes on small sites, in order to significantly increase the contribution of small sites to meeting London's housing needs. The plan's figure of 5,100 homes is 'based on previous trends for delivery from small sites'. The figure of 5,100 is not a pro-active approach to delivery of small to medium sites and further small to medium sites should be allocated.
- 2.5 As confirmed in paragraph 4.2.1 of the London Plan, increasing the rate of housing delivery from small sites is a strategic priority. The draft Local Plan is therefore unsound, as it is not in compliance with the targets set out in London Plan Policy H2 and the deviation from this policy is not sufficiently justified.
- 2.6 In order to achieve a sound strategy, the Council need to allocate more small/ medium sized, available and deliverable sites that could deliver homes in the short to medium term, until the larger, complex regeneration sites deliver housing on a regular basis. This would ensure that a five-year housing land supply is in place and provide other benefits such as the earlier provision of affordable housing. Land to be allocated for housing to ensure the delivery required, could include targeted release of individual pockets of Metropolitan Open Land (MOL), where it is identified that the MOL is not serving any of the main functions for keeping that land open, where they are providing no public benefit and where those sites

are sustainably located. For example, the land to the east of Colney Hatch Lane, which Taylor Wimpey Strategic Land has an interest in, is one example of MOL land which is suitable to deliver housing or potentially other uses that could then free up other land for housing. It is a relatively small site which is a vacant former ILEA playing field site. It is isolated from other MOL, as it is surrounded by roads and development and therefore serves no real purpose as MOL. It does not provide any public benefit in terms of useable public open space and recreation, as it is not publicly accessible. The site is unconstrained, available and deliverable within the plan period.

- 2.7 This is an example of a suitable smaller/medium site which would assist with meeting Barnet's housing need and achieving compliance with the London Plan, and reduce the over reliance on large, complex urban regeneration sites to meet the housing requirement in the shorter term.

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