



Note

LB BARNET LOCAL PLAN EXAMINATION WRITTEN STATEMENT (ID058) - MATTER 6

1 Introduction

- 1.1 This Written Statement has been prepared by Quod on behalf of Hammerson UK Properties plc and abrdn (“H/abrdn”) in response to questions raised under “Matter 6: Transport, Communications and Infrastructure” 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/abrdn are the long leaseholders of Brent Cross Shopping Centre and surrounding land, and have been working with the Council and key stakeholders over the last two decades to facilitate its revitalisation as part of the wider Brent Cross Growth Area.
- 1.3 Given economic uncertainties in the retail market, H/abrdn 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 to the retail sector are so significant that it calls into question the appropriateness of a retail led development north of the A406.
- 1.4 H/abrdn 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/abrdn would welcome the opportunity to take this work forward in collaboration with the Council.
- 1.5 H/abrdn submitted representations (Ref id058) to the LBB Draft Local Plan Regulation 19 (“Reg 19”) Consultation.
- 1.6 H/abrdn have reviewed the Schedule of Proposed Modifications to the Draft Local Plan (June 2022), LBB’s response to the Reg 19 Consultation representations and the relevant examination and evidence documents.
- 1.7 H/abrdn remain supportive of the Council’s general approach to development within the Brent Cross Growth Area. However, for the reasons expressed in response to the relevant questions, H/abrdn maintain their view that at present the Draft Local Plan is technically unsound and requires additional amendments as proposed.

2 Response to Questions

- 2.1 This Written Statement is submitted in response to the following Matter 6 Questions:

Matter 6: Transport, Communications and Infrastructure

Issue:



Note continued

Whether the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan in relation to transport, communications and infrastructure?

Questions:

4) Policy TRC02 of the Plan includes a list of key new transport infrastructure that it 'in particular' would support. In that regard:

- a) *What is the justification for the identification of those specific projects from the more comprehensive list in the Infrastructure Delivery Plan (Core_Gen_19)?*
- b) *Would the delivery of the objectives of the Plan and the growth identified be contingent upon the listed transport improvements being fully delivered within the Plan period?*
- c) *Are each of the projects committed, where is this evidence and where necessary does the Plan need to safeguard land to enable their implementation?*
- d) *What is the source of the most up-to-date evidence in terms of funding arrangements and timescales for each of the listed projects?*
- e) *Would the Plan provide an effective approach to respond to circumstances if the delivery of one or more of the listed projects were to be delayed or otherwise not taken forward?*

Response to Question 4

- 2.2 H/abrdn fully support the modal shift to sustainable transport within the Growth Area.
- 2.3 It is now proposed for a new planning framework Supplementary Planning Document ("SPD") for the Growth Area to be prepared which is to respond to changes particularly around Brent Cross Shopping Centre.
- 2.4 The National Planning Policy Framework ("NPPF") (2021) defines SPD's as those which:
"..add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan." (p.72).
- 2.5 Given the purpose of the SPD to provide further guidance for development and its intended adoption date of 2024, H/abrdn question the prescriptive nature of Draft Policy TRC02. This is not considered to be in line with national policy. As per the proposed amendments to Draft Policy GSS02, H/abrdn suggest that the text is amended to state
"ii A replacement or remodelled and improved bus station at Brent Cross North Shopping Centre"
- 2.6 The precise nature of the replacement or improved bus station would be agreed with LBB, Transport for London and other key stakeholders as part of the drafting of the SPD.