

Examination of the Barnet Local Plan Review

27 June 2023

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Inspectors appointed by the Secretary of State

Dear Mr Lynch,

Inspectors' requests for clarification following consultation on Examination Documents arising from the hearing sessions

1. Further to the recent submission of EXAM140 dated 6 June 2023 which provides the Council response to the representations made to the consultation on Examination Documents arising from the hearing sessions, we thank the Council for the preparation of those documents and undertaking the related consultation at our request. We are continuing to reflect upon the evidence before us and intend to provide further correspondence setting out our interim findings and the next steps of the Examination as soon as possible. However, to assist that process, we have the following requests for clarification at this stage:

Brent Cross Growth Area

2. As part of our ongoing review of the evidence relating to Policies GSS01 and GSS02 of the Barnet Local Plan Review (the Plan), we have noticed that the housing figure given for the Brent Cross Growth Area in EXAM87 and EXAM90 appear to differ from the 7,500 dwellings given in EB_SOCG_19. We, therefore, request that the Council identify the most up-to-date figure, together with the sites within EXAM87 that would contribute to it and also confirm whether developer engagement has taken place to inform the delivery expectations on the build out of the sites since EB_SOCG_19 was published.

District Town Centres

3. EXAM90 identifies potential modifications to Table 5 of the Plan, including how housing growth would be distributed to District Town Centres. In the interest of certainty and to assist our ongoing consideration of Policy GSS08 of the Plan, we request that the Council identify the sites listed in EXAM87 from which the figure in EXAM90 for each District Town Centre is derived and/or any alternative sources of supply expected to contribute.

Estate Renewal and Infill

4. EXAM90 identifies potential modifications to Table 5 of the Plan with respect to the housing growth expected from estate renewal and infill. In the interest of certainty and to assist our ongoing consideration of Policy GSS10 of the Plan, we request that the Council identify the sites listed in EXAM87 and/or broad locations that would contribute to the identified housing growth for estate renewal and infill in EXAM90.

Major Thoroughfares

5. EXAM57 indicates that the Council has at least a partial reliance upon Public Transport Accessibility Levels (PTAL) for determining whether certain A-roads should constitute major thoroughfares for the purposes of Policy GSS11 of the Plan. However, other A-roads within Barnet have been excluded from the listed routes in Policy GSS11, some of which seemingly have significant areas of moderate to high PTAL. We, therefore, request that the Council further clarify the justification for selecting each of the routes identified in Policy GSS11 and explain how it is considered that their specific circumstances are different to each of the other A-roads within Barnet.

Climate Change

6. In seeking to justify the requirements of Policy ECC01 part d) (ii) of the Plan with respect to a carbon reduction target of at least 6% beyond Part L of the Building Regulations, EXAM70 refers to examples of other Local Plans in London. However, the evidence provided to justify the policies in other Plans is not clear. In such circumstances, we require further explanation of the locally derived evidence for your intended approach in Policy ECC01 part d) ii).

Barnet's Parks and Open Spaces

7. Further clarification is requested of the evidence that you consider justifies the proposed standards for provision of play space and playing pitches in Policy ECC04 part b) (ii) of the Plan. Additional explanation is required as EXAM66 proposes a standard of 0.5 sqm per child for play space and that the 'majority' of residents are within 1.2km of a playing pitch. In contrast, the Open Space, Sports and Recreational Facilities Assessment (EB_GI_01) identified a standard of 0.9ha per 1000 children for play space and a playing pitch standard of 0.75ha per 1000 population. We, therefore, need to understand the specific evidential basis upon which the proposed standards in EXAM66 are based and when assessing an application, how the surplus and deficits would be intended to be calculated for the purposes of Policy ECC04 on a per person basis for play space and playing pitches.

Biodiversity

8. Paragraph 10.26.5 of the Plan indicates that the Council will use the Mayor of London's Green Infrastructure maps and tools to identify both existing and potential green corridors across the Borough. This is reiterated in EXAM77 and

has relevance to paragraph 179(a) of the National Planning Policy Framework (the Framework). However, full details of the intended changes have not been provided to date, and it is likely that any necessary additions to the Policies Map would need to be explained in the Plan. We, therefore, require a detailed explanation of the existing designations arising from the Barnet Unitary Development Plan 2006 and the Barnet Local Plan 2012 (as proposed to be taken forward in the Policies Map) which you consider would meet the specified requirements of paragraph 179 of the Framework and/or whether further additions would be required to the Policies Map to accord with the available Green Infrastructure evidence.

9. In addition to the above, EXAM77 refers to a further proposed modification to Policy ECC06 part b) of the Plan to ensure that development proposals have regard to requirements of local and strategic green infrastructure studies as incorporated in the Green Infrastructure Strategy or other relevant local guidance. We welcome confirmation of whether this relates to the Local Nature Recovery Strategies and Nature Recovery Network as referred to in the proposed paragraph 10.26.10A in EXAM4, or otherwise request further clarification of the Council's intentions with respect to Policy ECC06 part b).

Transport Infrastructure

10. EXAM23, amongst other things, suggested that modifications would be put forward in due course that include the requirements in its Table 1. Having reviewed the subsequent EXAM documents we have been unable to locate a related proposed modification in the evidence and therefore, request that the Council clarifies its intentions in that respect.
11. Aside from the above, EXAM49 identifies that continued engagement with National Highways regarding transport modelling is taking place and that if they are satisfied with the evidence that the Council would seek to resolve the situation through sign-off of an updated Statement of Common Ground (SoCG). In that respect, we note that the SoCG with National Highways (EB_SoCG_18) has not been updated since September 2022. Taking account of those circumstances and the absence of a representation from National Highways to the recent consultation, please can the Council provide an update on whether there are any remaining matters of dispute. Furthermore, if National Highways have unresolved objections, we ask that the Council clearly identify them and set out the Council position with respect to matters of soundness on each.
12. Alternatively, if there are no unresolved objections ideally this should be confirmed through an update to the SoCG with National Highways. The deadline for receipt of an updated SoCG should be not later than **Friday 28 July 2023**.

Delivering the Local Plan

13. EXAM63, when taken with the preceding evidence, implies that the Plan will place some reliance upon future Supplementary Planning Documents (SPDs) with respect to planning obligations. In that regard, it should be noted that if the costings or means of calculation of the contributions expected from development are not set out in the Plan and rather in an SPD, they would only have the status of guidance. It follows that we request clarification from the Council, in the absence of a policy in the Plan proposed to address the prioritisation of planning obligations, whether it is intended that Policy DF1 of the London Plan be applied when proposals seek to demonstrate that planning obligations sought by the Plan cannot viably be supported by a specific development.

Site Allocation - Edgware Hospital

14. EXAM75 identifies an existing outline planning permission for Site No. 5: Edgware Hospital (21/0274/OUT) and EXAM87 includes an associated contribution of 129 dwellings to housing supply in the 0 - 5 year period. In that regard, to assist our ongoing consideration of the site allocation, we request that the Council confirm whether any reserved matters applications have been submitted for the site to date and if so, provide an update on the current status of any such application.

Site Allocations - Hendon Hub

15. EXAM75 provides a breakdown of the indicative residential capacity for the Hendon Hub scheme insofar as it relates to Site Nos. 35, 36, 38, 40 and 41, each of which have identified contributions to housing supply in EXAM87. Those figures are seemingly based on apportionment of proposals within planning applications (refs: 21/4709/FUL and 21/4722/FUL) and by applying a ratio of 2.5 student rooms as equivalent to 1 standard housing unit. In those respects, and to assist our understanding of the indicative residential capacities identified, we request further explanation of the specific apportionment of each application to the respective Site Nos. 35, 36, 38, 40 and 41 and clarification of whether they accord with the totals for each application.
16. In addition to the above, to assist our ongoing consideration of the Hendon Hub site allocations, we also request an update on the status of the aforementioned planning applications. Furthermore, noting that the Council have indicated that what they consider to be minor amendments are being pursued to the Hendon Hub development, we request confirmation as to whether this would require new planning applications and if so, the expected timescales involved and whether there are any other constraints to delivery of the Hendon Hub to be overcome such as land ownership and land assembly. In the interest of certainty, the Council should also confirm whether the revised proposals would involve any changes to the indicative residential capacities expected to come forward on Site Nos. 35, 36, 38, 40 and 41.

Site Allocations - North Finchley

17. EXAM75 sets out the Council position on application of the Central density matrix classification to Site Nos. 57, 60, 61, 64 and 66. Nonetheless, to assist our ongoing consideration of the site allocations in North Finchley, we request that the Council provide alternative calculations for the indicative residential capacity of each of those site allocations based on an Urban density matrix classification (in accordance with Figure 1 of the Plan).

Other Sources of Housing Supply

18. EXAM87 identifies the Finchley Memorial Hospital site as making a contribution to housing supply within five years based on an outline planning permission for major development. To assist our ongoing consideration of when the site has a realistic prospect of achieving housing completions, we request that the Council confirm whether any reserved matters applications have been submitted for the site to date and if so, provide an update on the current status of any such application.

Action Requested

19. Please prioritise the aforementioned requests for clarification as a matter of urgency and provide a response to each by not later than **Friday 28 July 2023**.
20. If there are any procedural or other questions arising from this correspondence, the Council should contact us via the Programme Officer. We are not inviting, nor envisage accepting, any comments or additional evidence from other Examination participants at this stage.

Gareth Wildgoose and Mark Philpott

INSPECTORS

27 June 2023