



Examination into London Borough of Barnet Local Plan

Stage 1 (Matters 1 – 7)

Matter 3 – Meeting the Borough's Housing Needs

Representations on behalf of
DTZ Investors UK Ltd (on behalf of Strathclyde Pension Fund)

(Respondent reference number 41)

MATTER 3: MEETING THE BOROUGH'S HOUSING NEEDS

MATTER STATEMENT – MATTER 3

1. These Representations are made on behalf of our client, “DTZ Investors UK Ltd” (“DTZ”), in response to the Inspectors’ Matters, Issues and Questions published on 12 July 2022. DTZ submitted written representations to the Regulation 19 Consultation of the Barnet Draft Local Plan in August 2021, in relation to the effective use of land and housing delivery. The points raised in this Matter Statement relate to Issue 1.

MIQ 3.1.5 Detailed questions on housing supply are to be addressed separately under matter 11. However, in overall terms, is the plan approach positively prepared insofar as it seeks to meet the identified housing requirement, particularly as the five-year supply must be made up of “specific, deliverable sites”, with “specific, developable sites” also being a component of the supply over the rest of the plan period?

What particular part of the Plan is not legally compliant and/or unsound?

2. The specific housing contribution of the New Southgate Opportunity Area (NSOA) to the identified housing requirement is not correctly identified, or encouraged to come forward, by policy GSS01 and Table 5.1.

What legal compliance issue or soundness test(s) does it fail, and why?

3. As currently drafted, policy GSS01 does not provide a strategy which, as a minimum, will meet the area’s objectively assessed needs and so this aspect of the Plan is not positively prepared.
4. The absence of identified future arrangements to secure the housing identified for the NSOA makes it uncertain if it can be delivered in the Plan period by this strategic designation, and so to this extent, the current Plan is not effective.
5. The housing trajectory for the Barnet Draft Local Plan is contained in Table 5¹ and identifies the housing totals that then appear in policies GSS01 -09. Further detail on supply from specific sites is set out in Annex 1 – Schedule of Proposals and Table 5A. Barnet’s Strategic Housing Market Assessment (SHMA, 2018) identifies the Full Objectively Assessed Need (OAN) for housing in Barnet as 3,060 dwellings per year (or 46,000 new homes over the Plan Period).
6. The London Plan (2021) sets a 10-year housing target for Barnet of 23,640, as a minimum². The Draft Plan proposes to meet the London Plan target over the Plan Period to 2036, equating to 35,460 new homes, while providing a supply of sites for up to 44,000³ new homes.

¹ Refer page 38 of Barnet’s Draft Local Plan (Reg 19) 2021 to 2036

² London Plan Policy H1 Increasing housing supply

³ Proposed Modification MM25 reduces the total supply figure from 46,000 (per Reg 19 submission) new homes to 44,000, as set out in Barnet’s Housing Trajectory and 5-Year Supply report, dated November 2021

Table 5 - New Homes Delivery – 2021/22 to 2035/36

	Years 1-5	Years 6-10	Years 11-15	Total Supply
	2021/22	2026/27	2031/32	
	–	–	–	
	2025/26	2030/31	2035/36	
<i>Brent Cross</i>	600	3,700	5,200	9,500
<i>Brent Cross West</i>	-	-	1,800	1,800
<i>Cricklewood</i>	1,250	150	-	1,400
<i>Edgware</i>	100	3,250	1,650	5,000
<i>Colindale</i>	3,000	1,100	-	4,100
<i>Mill Hill East</i>	1,200	200	100	1,500
Growth Areas Sub-Total	6,100	8,400	8,800	23,300
District Town centres	1,950	2250	1,200	5,400
Existing & New Major Transport Infrastructure	-	950	700	1,650
Estate renewal & infill	1,350	2,500	550	4,400
Major Thoroughfares	2,050	1,300	-	3,350
Other large sites	1,100	1,500	200	2,800
Small Sites (under 0.25 ha)	1,700	1,700	1,700	5,100
Total	14,250	18,600	13,150	46,000

Table 1 Housing delivery in Barnet

7. Subsequently, a surplus of 8,540 new homes would be provided above the London Plan housing requirements, over the 15-year plan period. Based on current consents and projected delivery of allocated sites, THE LPA consider it can demonstrate a deliverable supply of 6.5 years⁴.
8. We are supportive of the surplus housing supply identified. However, the absence of the NSOA housing contribution should be noted, along with the designated, strategic importance of the NSOA in terms of its intended growth potential⁵. Section 3.1 of the Draft Plan states that housing and job growth has been directed into the most sustainable locations with good public transport and active travel choices, including New Southgate. Proposed Modification MM20 echoes this, asserting that growth will be concentrated in accordance with the Plan’s suite of strategic policies GSS01 to GSS13 in Barnet’s Growth Areas, District Town Centres, and New Southgate Opportunity Area. Notwithstanding this, Table 5 above does not individually identify the delivery capacity of NSOA, which is an anomaly and at odds with the objectives and other policies of the Plan.
9. The NSOA is not identified by name in Table 5, being concealed in the Existing and New Major Infrastructure category, and not treated on a like for like basis with other OAs such as the Collindale OA. This means that the NSOA has been underutilised, producing an oversupply of housing allocations in non-strategic areas.
10. Furthermore, the Plan acknowledges that OAs are designated within the London Plan as the capital’s principal opportunities for accommodating large scale development. The Plan therefore does not conform with the London Plan. This is because the NSOA has been overlooked, and subsequently, the Plan has under-allocated this OA in terms of its new homes delivery target.
11. Adding the NSOA housing contribution correctly would provide a buffer for resilience and flexibility, so that the Plan can respond to market fluctuations, including taking account of the sequential flood

⁴ Refer page 2 of Barnet’s Housing Trajectory and 5-Year Supply, November 2021

⁵ As per London Plan Policy SD1; and Draft Policies BSS01; GSS

assessment requirements. Friern Bridge Retail Park, for example, is located in Flood Zone 1, the lowest risk area. It in turn would be sequentially preferable to other sites with draft allocations that fall within Flood Zones 2 and/or 3.

How could the Plan be made legally compliant or sound?

12. For the Plan to be positively prepared, the distinct and prioritised role of the NSOA needs to be explicitly recognised by the Adopted Plan and its housing delivery target increased. This is to reflect the indicative 2,500⁶ new homes target within the London Plan, recognising that this total is split between three boroughs.
13. This should be addressed in Draft Policy GSS01 and GSS09, by significantly increasing the identified new homes target for NSOA. Additionally, paragraph 4.4.5 in Chapter 4 should explicitly recognise that this OA provides a broad area where additional housing supply can suitably be brought forward, particularly if a shortfall in supply emerges due to under supply elsewhere. This buffer will promote resilience throughout the Plan period and render the plan in conformity with the London Plan.

What is the precise change that is sought?

14. In Policy GSS01 the NSOA should be taken out of GSS01 (c) and placed in GSS01(a) so it is treated on the same basis as other OAs (e.g. the Colindale OA), and identified by name;
15. The NSOA should be allocated a housing target of up to 1,000 new homes to be delivered across the Plan period, such that the designation can conform with the London Plan total. This figure would be reflective of LB Barnet's share of the indicative 2,500 total; and
16. Consequential arithmetic changes should be made to the other housing totals in GSS01, other GSS policies and Table 5.1 as necessary.

MIQ 3.1.3 Having regard to the London Plan housing requirement of 2,364 homes per year for the ten-year period covering 2019/20 to 2028/29:

a) What is the basis for the Plan identifying the housing requirement for the remaining years to the end of the Plan period and would it be in general conformity with the London Plan?

17. For the plan to be in general conformity with the London Plan it should optimise the contribution of London Plan designations such as the NSOA. Please refer to the points we have made in relation to Question 3.1.5 above which apply equally in response to this Question 3.1.3 and so are not repeated here.

⁶ Policy SD1 Opportunity Areas, Table 2.1 – Opportunity Area indicative capacity for new homes and jobs