



Planning Policy Team,
Barnet Council,
6th Floor
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London,
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18 June 2024

By email: forward.planning@barnet.gov.uk

Dear Sir/Madam,

BARNET MAIN MODIFICATIONS TO THE DRAFT LOCAL PLAN CONSULTATION REPRESENTATIONS ON BEHALF OF DTZ INVESTORS UK LTD (ON BEHALF OF STRATHCLYDE PENSION FUND)

These Representations are made on behalf of “Glasgow City Council as administrative authority of Strathclyde Pension Fund c/o DTZ Investors UK Ltd” (“DTZI”), in response to the London Borough of Barnet’s consultation on the Proposed Main Modifications (May 2024) to the Draft Local Plan. These Representations specifically comment on the modifications proposed to the following policies and chapters:

- Chapter 1 – Introduction;
- Chapter 3 – Barnet’s Vision and Objectives, including the Key Diagram;
- Draft Policy BSS01 (and the supporting text) – Barnet’s Spatial Strategy;
- Draft Policy CDH04 – Tall Buildings; and
- Draft Policy TOW01 – Vibrant Town Centres.

DTZI previously submitted written representations to the Regulation 19 Consultation of the Barnet Draft Local Plan in August 2021, in relation to the New Southgate Opportunity Area (“NSOA”) and their development interests at Friern Bridge Retail Park (FBRP). DTZI also submitted written representations to the Examination in August and September 2022, and attended the Examination hearings. Most recently, in May 2023 DTZI also submitted representations to the Draft Local Plan Examination Notes.

Comments to Proposed Main Modifications

Chapter 1 – Introduction

Chapter 1, as proposed to be modified, explains that The London Plan designates New Southgate as an Opportunity Area, which includes parts of LB Barnet, LB Enfield and LB Haringey. It states that the Council is working with the GLA, LB Enfield and LB Haringey to produce a joint planning



framework for the area, which will establish the boundaries of the Opportunity Area and that will further assess its the development potential of this area.¹

DTZI supports this in principle. However, we see no reason why the boundaries of the element of the NSOA within Barnet cannot be defined. The London Borough of Enfield has defined the “Place Making Urban Boundary” of New Southgate within its New Enfield Local Plan - Regulation 19 consultation (March to May 2024), and also included a strategic policy specific to New Southgate (draft Policy PL7). Therefore, Barnet should do the same to prevent delaying the definition of the Opportunity Area boundary and the preparation of the framework.

However, at this stage it is evident that the NSOA will not be addressed through a policy included within this draft Local Plan. Therefore, it becomes critical that the timescales for the Local Plan Review and NSOA Framework are more clearly defined. The Main Modifications propose for the timescales for the preparation of the framework, and the Local Plan Review, to be set out in a new Local Development Scheme and commit to the Local Development Scheme being prepared within 12 months of adoption of the current draft Local Plan.²

As set out in our earlier representations (to the Examination Notes, May 2023), and given that The London Plan designates New Southgate as an Opportunity Area, the Council should prioritise the preparation of the framework no later than in an early review of the Local Plan.

The commitment to prepare a Local Development Scheme within 12 months is too vague and provides no commitment to when the early review, or the preparation of the framework, will take place. The position is ambiguous and creates uncertainty. An early review might reasonably commence within 12 months of adoption, and be adopted well in advance of the required five years ie within three years.

Without defining the timescales for the preparation of the framework, the draft Local Plan fails to provide a strategy which meets the area’s objectively assessed need and therefore it has not been positively prepared.

Furthermore, unlike the London Borough of Enfield, Barnet has failed to define its boundaries of New Southgate by deferring this task to a later date. Therefore, by definition, the preparation of the draft Local Plan is not effective as it is not based on effective joint working on cross boundary strategic matters.

For the above reasons, the draft Local Plan is unsound.

Chapter 3 – Barnet’s Vision and Objectives, including the Key Diagram

The Main Modifications propose to update the supporting text to the Key Diagram to explain that NSOA will have its own symbol on the diagram because its boundaries have not yet been defined.

Notwithstanding our earlier comments, DTZI has no concerns with the use of the symbol in principle. However, DTZI’s client owns Friern Bridge Retail Park (FBRP), which we expect will be included within the Opportunity Area’s boundaries in due course. Therefore, it is requested that the supporting text is amended to clarify that the symbol on the diagram only represents the

¹ Main Modification 3 – Chapter 1, paragraphs 1.3.1 to 1.3.3

² Main Modification 4 – Chapter 1, paragraphs 1.7.1 to 1.7.3

approximate location of the Opportunity Area, and that it does not show which land and properties are included within it.³ We suggest the following amendment (in **bold**):

*“3.4.2A The London Plan designates New Southgate as an Opportunity Area. The Opportunity Area includes parts of LB Barnet, LB Enfield and LB Haringey. The Council is working with the GLA, LB Enfield and LB Haringey to produce a joint planning framework. The framework will establish the boundaries of the Opportunity Area. As the boundaries of the New Southgate Opportunity Area have not yet been defined the area is represented as a symbol on the Key Diagram. **The symbol shown therefore represents only the approximate location of the Opportunity Area. It does not indicate the land and properties that will be included within its boundaries.**”*

Draft Policy BSS01 (and the supporting text) – Barnet’s Spatial Strategy

Draft Policy BSS01 sets out the Spatial Strategy for Barnet including, at Part A, the types and quantum of development that the Council needs to deliver to make its vision happen.

At Criteria e of Part A, the Main Modifications set out the Council’s approach to retail and leisure development, which is generally focussed on the Brent Cross Growth Area as well as Major and District town centres. However, this wording fails to acknowledge the potential of existing well established retail parks such as FBRP to make a positive contribution to Barnet’s Spatial Strategy.

The Council has identified previously (Barnet Town Centre Floorspace Needs Assessment 2017) a need for a significant amount of new retail and leisure floorspace across the borough with demand for another 77,000qm of comparison floorspace and 33,330sqm of food and drink uses up to 2036. Some of this requirement could be accommodated at existing accessible retail parks such as FBRP, and this should be recognised in the Draft Local Plan.

Sites such as FBRP already accommodate retail and other main town centre uses and, therefore, they represent sustainable locations for further development. The maintenance and/or enhancement of the retail function of FBRP would also be consistent with its location in the NSOA. The Local Plan should, therefore, recognise that such accessible and well-established retail sites are also appropriate to accommodate new retail and leisure development rather than other out of centre sites, and that they can therefore assist in the delivery of development needed to meet the Council’s aspirations.⁴

We, therefore, recommend that Part A, Criteria E of Policy BSS01 is amended as set out (in **bold**) below:

*“e) An approach to retail and leisure development focussed upon the implementation of the planning consent at the Brent Cross Growth Area, ensuring the viability and vitality of Barnet’s Major and District town centres, **and existing, well-established retail destinations**, through an appropriate mix of uses, and addressing any location-based requirements (including where necessary to support the delivery of allocations in the Plan - subject to, where relevant, the sequential and impact tests set out in Policy TOW01) rather than identification of a specific requirement for net additional floorspace.”*

³ Main Modification 10. Chapter 3, paragraphs 3.4.1, 3.4.2, 3.4.2A & Key Diagram

⁴ Main Modification 9. Policy BSS01, Part A, Criteria E.



In order for the above suggested amendment to be implemented, it is suggested that existing, well established retail destinations such as FBRP are formally identified in the retail hierarchy of the Local Plan and on associated maps.

Without this acknowledgement, the draft Local Plan has not been positively prepared, it is inconsistent with national policy as it does not entirely enable the delivery of sustainable development, and it is, therefore, unsound.

Draft Policy CDH04 – Tall Buildings

The Main Modifications propose to remove the NSOA as a potentially appropriate location for tall buildings, on the basis that there is insufficient evidence to support tall buildings in that location.

However, New Southgate is identified as an Opportunity Area in the London Plan, which also defines opportunity areas as the principal opportunities for accommodating large scale development. Therefore, although it is acknowledged that the boundaries of the NSOA have not yet been defined, to be in accordance with the London Plan, the NSOA should continue to be listed in CDH04 as an appropriate location for tall buildings (subject to the outcome of the necessary detailed assessments).⁵

The exclusion of the NSOA from the list would be unjustified and inconsistent with the London Plan, therefore warranting the policy as unsound.

Draft Policy TOW01 – Vibrant Town Centres

The Main Modifications propose changes to the list of centres where an appropriate mix of uses will be supported by the Council.

As per our comments above in relation to Draft Policy BSS01, Part A of Policy TOW01 should be amended to identify existing, well established retail destinations such as FBRP as appropriate locations for further retail and leisure development.⁶

Conclusions

DTZI's client is a major landowner within the Barnet administrative area and it has engaged with the Council throughout the preparation of this draft Local Plan.

DTZI's interests in the draft Local Plan relate primarily to the future of FBRP, including the NSOA which we expect FBRP to sit within. DTZI's current and previous representations are submitted in respect of these interests.

Whilst DTZI supports the majority of the policies contained within the draft Local Plan in principle, these comments and its previous representations set out the changes that are required to make the plan sound.

We therefore respectfully request that DTZI's comments are taken on board, and we look forward to receiving further updates on the preparation of the plan.

Please let me know if you require any further information or have any queries.

Yours faithfully,

⁵ Main Modification 46. Policy CDH04.

⁶ Main Modification 53. Policy TOW01 Part A.



Nicola Sewell



Associate Director