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**Barnet Local Plan  
Examination  
Response to Matter 11:  
Delivering the Identified  
Requirements Over the Plan  
Period**

St William Homes LLP

6 September 2022

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## **1.0 Introduction**

- 1.1 This statement to Matter 11 (Delivering the Identified Requirements over the Plan Period) of the examination of the Barnet Local Plan ('the Plan') is submitted by Lichfields on behalf of St William Homes LLP ('St William'). It follows the submission of representations to the Regulation 19 Draft Local Plan (June-August 2021).
- 1.2 St William have an interest in the former gas holder site located 21 Albert Rd, New Barnet, EN4 9SH, highlighted in the draft plan as New Barnet Gasholder Site No 21. The site is a redundant brownfield Gasworks site and in line with the NPPF is suitable and available for housing delivery, helping to meet the Council's housing growth objectives.
- 1.3 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.
- 1.4 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 7: Is there reasonable confidence that a 5-year supply would be maintained throughout the Plan period? If not, how could this be achieved?**

- 2.1 There is concern that there cannot be complete confidence in the 5 year housing land supply being taken forward beyond the first five years due to an over-reliance on large regeneration and windfall sites.
- 2.2 As set out in the NPPF paragraph 68, planning policies should identify a sufficient supply and mix of sites including specific, developable sites for years one to five of the plan period. It is therefore important that there is confidence that a 5-year supply would be maintained throughout the Plan period in order to ensure Barnet's housing requirement is met.
- 2.3 The NPPF also sets out that while the supply of large numbers of new homes can often be best achieved through planning for larger scale development, small and medium sites can also make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly. The draft Local Plan includes a number of large and complex urban regeneration sites to deliver the homes required. There is a high risk that reliance on a small number of large complex sites could adversely impact the consistency of land supply over the plan period.
- 2.4 With only a limited source of supply there is a great risk of under delivery if any one site does not deliver. This issue has previously been acknowledged in Barnet's Housing Delivery Action Plan (2021) which states that:
- 'high dependence on larger sites results in a potential risk to overall future delivery, given the broad reliance on meeting a significant proportion of the target for new homes through a small number of very large schemes. For these schemes, experience shows that they can often have more complex issues that require resolving, and these can therefore have the potential for significant delays.'*
- 2.5 For example, at Edgware Town Centre, 5,000 new homes are expected to be delivered by 2036, with 100 of these by 2026 and a further 3,250 of these by 2031. However, the Edgware Growth Area SPD (2021) notes that there are a number of private and public landowners within the Growth Area including Ballymore Group, Transport for London and Sainsburys (longstanding leasehold interest). Paragraph 8.10 of the SPD states that *'In some instances, development may be most effectively realised through a process of land assembly. While it is anticipated that this process will be carried out through negotiation, the councils will pursue the option of compulsory purchases orders (CPO) if required.'* It can take many years to resolve complex landownership issues.
- 2.6 Furthermore, the Plan is reliant on 2,050 homes to be delivered at Major Thoroughfares. Policy GSS11 sets out that development along main road corridors can provide significant supply of sites for growth. The policy states that *'While specific sites along Major Thoroughfares are identified by the Schedule of Proposals it is expected that further sites will come forward in response to the opportunities for growth.'* As specific sites have not been identified for the homes to be delivered at Major Thoroughfares, there is a risk that

housing delivery will not come forward at these areas throughout the plan period to the extent envisioned.

- 2.7 Therefore, it is important to ensure that the capacity of smaller and medium sized sites is optimised as far as possible, so that these sites can assist in ensuring a 5-year supply is maintained throughout the plan period. The Plan sets out that 5,100 homes will be delivered on windfall sites but to ensure certainty of delivery it would be preferable to allocate more homes on suitable and accessible sites that are already identified for allocation where capacity can be optimised. For example, the site (allocation 21) at Barnet Gasworks is a site that is identified as suitable for residential development with an indicative capacity of 201 homes . This site is deliverable and early design-led site analysis by St William indicates that a larger capacity of around 300 homes can be delivered utilising a design led approach at this site. This is explored further in our response to Matters 8 and 10.

**Question 9: Is there a sufficient range and choice of sites allocated in the Plan in terms of location, type and size, to provide adequate flexibility to meet the housing requirement for the Borough in the Plan? Would the housing allocations ensure that the Plan would be consistent with the Framework, in so far as it seeks to boost significantly the supply of housing?**

- 2.8 There is concern that there is an over-reliance on larger, strategic regeneration sites to deliver the homes required. There is a risk to delivery on the reliance of a few larger sites. There should be a broader base of homes but, more importantly, an emphasis to ensure that development on all accessible, allocated brownfield sites is optimised in line with the Framework. As stated in the London Plan (paragraph 4.1.3) ‘The Mayor recognises that development of this scale will require not just an increase in the number of homes approved but also a fundamental transformation in how new homes are delivered’.
- 2.9 As set out above, it is important that the capacity of each site is determined in accordance with the design-led approach to optimising capacity set out in London Plan Policy D3. This will ensure that there is not an over-reliance on large, complex strategic urban regeneration sites within the Plan, which may be subject to delays in delivering new homes. As set out in the NPPF paragraph 68, planning policies need to take into account the availability, suitability and likely economic viability of sites. Some of the larger sites within the Plan may be subject to delays in this regard.
- 2.10 At Edgware Town Centre, 5,000 new homes are expected to be delivered by 2036. However, no material progress has been made on this to date and, as stated above, there are a number of public and private landowners and land assembly issues may take many years to resolve. There is little evidence to indicate that these homes will come forward in this timeframe.
- 2.11 In order to mitigate against the risk of delay of such sites coming forward, it is important to ensure a sufficient supply of housing delivery on other sites in the Borough that are available and deliverable. Policy D3 of the London Plan requires a design-led approach to optimising site capacity; it is important that Barnet’s Local Plan is consistent with this and

that the capacity of all site allocations is optimised, to ensure adequate flexibility to meet the Plan's housing requirement.

**Question 11: Is the expected contribution to housing land supply from windfalls realistic and justified by evidence?**

- 2.12 At present, there is an overreliance on windfall sites with 5,100 of 46,000 homes in the plan period to be delivered on small windfall sites. The plan's figure of 5,100 homes is 'based on previous trends for delivery from small sites' and yet this is a diminishing resource. As the reliance on windfall sites is in question, it should be ensured that the capacity of site allocations is optimised, following a design led approach, so that their potential contribution to Barnet's housing requirement can be realistically realised.

**Question 12: What contingencies are in place should housing delivery fall below expectations within the sites in strategic policies (Policies BSS01 and GSS01 to GSS13) and the proposed allocation of sites listed in Annex 1 of the Plan? Would it be necessary to consider other areas for development?**

- 2.13 To ensure that there is some form of contingency in place, it will be important to ensure that housing development from the allocated sites listed in Annex 1 of the Plan can be optimised. In particular, there is potential to increase the supply of homes in District Town Centres and land on the edge of those centres identified as being suitable for development. At present, 5,240 homes are expected to come forward on these sites, but at such locations and on accessible, urban brownfields sites close to town centres there should be more impetus in the Plan to optimise capacity.
- 2.14 The indicative figures included in the proposed allocations are based on a density matrix, which is now obsolete in the adopted London Plan. Site Allocation figures should be informed by thorough site analysis and technical studies undertaken and need to be supplemented by a process of design-led optimisation, having particular regard to a site's location in proximity to town centres, where greater growth is encouraged in the London Plan and NPPF.
- 2.15 This will ensure the Plan is consistent with the aims of the London Plan and the strategic aims set out elsewhere in the Plan, which identify capacity within and on the edge of District Town Centres for 'substantial' new growth (this is explored further in our response to Matters 8 and 10). The Plan should emphasise that the figure of 5,240 new homes from allocations in District Town Centres is a minimum figure, and that development in these locations should be optimised wherever possible.
- 2.16 Initial design work and technical site analysis has been undertaken by St William, which has identified that the New Barnet Gasholder site (identified as being an opportunity site on the edge of the District Centre and within the Framework area) could deliver around 300 new high quality homes, as opposed to the 201 homes currently shown within the allocation. This is identified in the New Barnet Town Centre Framework plan for growth as it is a highly accessible brownfield site close to public transport and facilities. The development of the site is consistent with the London Plan Objective GG2 which seeks to enable the development of brownfield land and prioritise sites well-connected by public



transport, Policy SD6 which supports greater residential development within and on the edge of Town Centres, and the NPPF paragraph 119 which seeks to make as much use as possible of brownfield land.



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