

Matter 2 Housing
London Borough of Barnet
Written Statement

Hearing Session 6 December 2011

Prepared on behalf of A2Dominion

November 2011

London Borough of Barnet

Examination Written Statement

Prepared on behalf of A2Dominion Group

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1.0 INTRODUCTION

1.1 This statement is submitted in response to the matters raised by the Inspector in his 'Hearing Programme and List of Matters' dated 25th October 2011, specifically in response to Matter 2 Housing. We set out our response to the questions raised that are relevant to the submissions already made by our client. We confirm that this is a further Written Statement only, and that we will not be attending the Hearing Session.

1.2 Barton Willmore are instructed by A2Dominion Group ('A2D'). A2D provides over 33,000 homes across London and southern England with thousands in development. It offers a wide range of housing options, including affordable rented, temporary, student, sheltered, supported and key worker accommodation, as well as homes for sale and shared ownership. A2Dominion is the owner of the 1.453 ha Geron Way site in Cricklewood, falling within the Cricklewood, Brent Cross and West Hendon Regeneration Area SPG December 2005.

1.3 The site is the subject of an extant planning application (LPA Ref F/01932/11) for:

"Redevelopment to provide for 262 residential units, 812 sq.m of commercial accommodation (B1, D1 and D2) and associated car parking and amenity space, and creation of new vehicular access from Edgware Road."

1.4 A2D are broadly supportive of the CS, with the Cricklewood / Brent Cross area identified for growth. Our concern, as articulated in our statements made in respect of Matters 1 and 9, is the role and approach of the CS in guiding that growth.

Question 1: Are the two plans based on sound evidence of demand and supply of housing? What evidence does the Council rely upon to arrive at the Figures in Table 2 of the CS? Should Policy CS4 seek to ensure housing supply at a rate necessary to meet or exceed this target?

- 1.5 The CS covers the period 2011-2026, with Policy CS4 identifying a housing target of 28,000 dwellings for this period. In answering the last question first, the CS must be in general conformity with the London Plan 2011. In short, does Policy CS4 correctly identify the London Plan 2011 housing target in terms of both quantum and whether it is a target to met or exceeded.
- 1.6 London Plan 2011 Table 3.1 sets a ten year minimum target of 22,550 dwellings (2011-2021), with an annual monitoring target of 2,255 units. Policy 3.3 states that in LDF preparation boroughs should seek to achieve and exceed the relevant minimum borough annual average housing targets in Table 3.1 and, if a target beyond 2021 is required, roll that forward and seek to exceed it.
- 1.7 The CS covers the period 2011-2026, and based on the above should plan for a housing target of 33,825 dwellings. CS Policy CS4 identifies a housing target of 28,000 dwellings for this period. The London Plan is clear that such a housing target is a minimum that should be exceeded. The CS is not therefore in general conformity with the London Plan 2011 and is unsound on this basis.
- 1.8 Notwithstanding our position above, the Inspector has requested comment as to whether the housing delivery set out Table 2 (now Table 3) of the CS is based on a robust and credible evidence base of supply and demand. It is noted that Inspector's questions dated 9 September 2011 (Library Ref INSP 002) sought clarity on the sources for Table 2.
- 1.9 With regard to line 6 Priority Housing Estates, Table 2 identifies no delivery from Brent Cross / Cricklewood for the period 2011-2016 with 1800 units 2016-2021 and 3300 units from 2021-2026 (a total of 5100 from this opportunity area). The Council identified in its response to the Inspector's question that the units to be delivered in Brent Cross / Cricklewood by 2026 were based on that permitted by the hybrid planning permission of 28 October 2010. The figures are therefore based on no other anticipated supply from the Opportunity Area beyond the planning permission.

- 1.10 As set out in our response to Matter 9, the planning permission provides for circa 7,550 new homes. On the basis that the London Plan Opportunity Area designation provides for in excess of 10,000 new homes, the CS and housing trajectory should be looking beyond the existing planning permission to ensure that the growth envisaged by the designation is met. Specifically the role of sites, not reliant on significant infrastructure provision, that can make an early provision of housing should not be discounted. Meeting housing targets is often reliant of identifying a range of site sizes and products to meet both supply and demand.
- 1.11 Whilst it is for the Council and BXC Development Partners to demonstrate deliverability of the proposed housing completions, in our view 360 units per annum for years 6-10 and 660 from years 11-15 is ambitious not least in terms of construction programmes and timely infrastructure provision but also in terms of market demand. Put another way this rate would require sales of 7 and 13 homes per week respectively over these periods.
- 1.12 As drafted Policy CS4 is not in general conformity with the London Plan 2011. In our view the CS needs to identify and plan for a rate of delivery that exceeds the London Plan 2011 housing targets. We would also query the deliverability of the housing supply and demand for the Brent Cross / Cricklewood Area based on the extant grant of planning permission.

Question 5. Do the dwelling size priorities in DMP Policy DM08 adequately represent the likely future demographic changes anticipated over the lifetime of both plans and other evidence? Should the policy be amended to indicate that housing mix will be considered on a site by site basis?

- 1.13 Policy DM08 sets very specific housing mix priorities for different forms of housing tenure. Paragraph 9.1.4 of the DMP identifies that housing needs have been based on the North London Strategic Housing Market Assessment. Noting further that this document estimates housing requirements by dwelling size and tenure (rented or owner-occupied) for the next five years.
- 1.14 The role of the CS is to set the growth strategy for the Borough for the next 15 years, in turn it is the role of the DMP to set the policy basis to assess and deliver that growth. We would therefore question whether prescribing a housing mix for what could be a 15 year period based on a document prepared to provide a projection for a 5 year period constitutes a robust and credible evidence base.

Moreover whether on this basis the policy is sufficiently flexible to deal with demographic changes and respond to changes resulting from housing supply and demand.

- 1.15 Furthermore, we would question whether the approach, which includes setting out priorities for market housing, is consistent with national planning policy. PPS3, paragraph 23 states that *“developers should bring forward proposals for market housing which reflect demand and the profile of households requiring market housing, in order to sustain mixed communities”*. Assessment of the appropriateness of market housing mix should also relate to developers’ knowledge of the local market and demand.
- 1.16 As drafted the policy is not based on a robust and credible evidence, is inflexible in its approach and not therefore effective. Whilst paragraph 9.1.7 states that ‘this policy can be applied flexibly’ there is a need for further clarity and certainty for developers. We would suggest that as per our representations made prior to submission, if the splits are to remain, they should be identified as borough wide targets and not targets to be applied on a site by site basis.
- 1.17 This flexibility is needed to enable proposals to reflect the individual site conditions, character of the area, availability of public subsidy which may influence the mix provided, and the overall merit of the proposals.