

## **CONSULTATION ON THE PROPOSED FURTHER CHANGES TO THE CORE STRATEGY AND DEVELOPMENT MANAGEMENT POLICIES DPDs**

Following the Examination in Public of the London Borough of Barnet's Core Strategy and Development Management Policies Development Plan Documents in December 2011 and the publication of the consequent Proposed Further Changes, we wish to submit our comments on this document.

These comments follow representations to both documents submitted in June 2011 and two written statements, submitted in November 2011, in advance of our appearance at the EiP in December 2011. During the EiP Session 2: Housing, the Inspector invited discussion on how the figure of 400 net dwellings had been calculated with regard to the North London Business Park's contribution to overall housing supply (Core Strategy Policy CS3 and Table 3).

The Proposed Further Changes recommend the insertion of the wording **'in the range of'** prefixed to guidance that 400 new homes will be developed at the North London Business Park and Oakleigh Road South (Prefix Changes CS E15 and CS E16). We do not consider that this change to the wording is sufficient and the guidance thus remains unsound, as it does not accord with the 2011 London Plan density matrix, which the Council state at paragraph 8.3.2 of the Core Strategy that they would have regard to.

The 2011 London Plan density matrix indicates a maximum of 75 units per hectare on a site such as the NLBP; as it falls within a Public Transport Accessibility Level Zone of 0 – 1 and is within a 'Suburban' location. The North London Business Park (excluding Oakleigh Road South) is 16.5ha. Approximately 3 – 3.5ha of this space currently comprises employment space; we acknowledge the importance of this employment space to the Borough stock and site capacity assumptions are based on its retention. The NLBP therefore presents 13 ha of developable land, which at a density of 75dph could achieve 975 new units. This is an indication of what the site could achieve.

As we understand that Barnet Council intend to 'optimise' as oppose to 'maximise' upon density targets, the achievable density can be adjusted to ensure any future development respects the local context and maintains a high quality design with open space, community facilities, parking and circulation provision. Initial massing studies indicate what could be achieved on site and recommend that the site could accommodate 683 residential units (avg. 53dph). These figures are based upon a design-led masterplan that the owner has commissioned to assess the capacity of the site and to inform future redevelopment opportunities. The masterplan sought to retain the existing quantity of employment space, and adopted a zoned approach to density; which increased and decreased to sensitively respond to the appearance of the proximate built environment. The masterplan also includes parking, amenity space and landscaping; it does not seek to simply maximise the quantum of developing by inappropriately relying upon maximum density guidelines as identified within the 2011 London Plan.

It is of note that the figures outlined above refer **only** to the North London Business Park and not to Oakleigh Road South (ORS). The Core Strategy however includes ORS within the figure of 400 net additional dwellings distribution identified Policy CS3 and Table 3. This indicates that the Council consider that the North London Business Park as an individual site, not as the wider area description that includes ORS, would accommodate even less than 400 net dwellings, a figure which already significantly underestimates its capacity.

Whilst we understand that the figure of 400 net dwellings is based on the 2006 Planning Brief, we consider it to be unsound as it does not comply with guidance found within the 2011 London Plan. The proposed further change of introducing the wording **‘in the range of’** does not sufficiently address the shortfall between the expected and actual capacity of the NLBP; such wording typically allows for a deviation of +/- 10%. We consider that this figure should be increased to at least 700 units; this would more accurately reflect the capacity of NLBP and reduce the current unsound departure from the 2011 London Plan.