

Our Ref: 02C204673

25 April 2023

Nick Lynch
Planning Policy Manager
London Borough of Barnet
2 Bristol Avenue
Colindale
London
NW9 4EW

[sent by email]

Dear Nick

EXAMINATION IN PUBLIC BARNET LOCAL PLAN REVIEW, MATTER 10 (SITE ALLOCATION NO.67 AT GREAT NORTH LEISURE PARK)

RESPONSE TO EXAM DOCUMENTS

At the Hearing Session for Matter 10 of the Barnet Local Plan Review Examination in Public, held on Tuesday 8 November, it was agreed with the Planning Inspector that we would engage with the Council to establish an appropriate indicative residential capacity for Site Allocation No. 67 (Great North Leisure Park).

Actions following Hearing Session

A letter and supporting material was sent to you on 17th November 2022, demonstrating how the Great North Leisure Park site provides an excellent opportunity to deliver much needed additional homes over the plan period, significantly beyond the 352 figure stated in the Regulation 19 version of the plan. This is on the basis of:

- A design-led approach to optimising site capacity (in accordance with London Plan Policy D3); and
- The Council's proposed removal of the originally proposed 60:40 split between residential uses and commercial/leisure/community use on the site (through the Proposed Modifications).

We consider that a scheme of 1,000 homes can be comfortably delivered on the site, and there is an opportunity to deliver in the region of 1,200 homes on the site, in line with the draft site allocation requirements such as public realm improvements (and with no buildings exceeding the 'Tall Buildings' definition (all below 15 storeys)).

In order for the proposed Site Allocation No. 67 to be considered sound, and the number of homes identified for the site to be justified and consistent with the London Plan approach to optimisation through the design-led approach, we requested that the indicative site capacity takes into account the ability of the site to accommodate 1,000 to 1,200 homes.

LBB Updated Housing Delivery and Trajectory

We summarise the key elements of the EXAM documents relating to the site:

- **EXAM 36** – LBB Note on Housing Numbers
 - Confirms that housing numbers for strategic sites have been derived through the density matrix or through planning permissions. LBB argue that many of the principles that underpin the Density Matrix (e.g. PTAL and context) are captured in the design-led approach of the London Plan 2021.
 - The Council confirm that there is no housing numbers shortfall in the London Plan. The Plan target is as expressed in Policy BSS01 a minimum of 35,460 homes by 2026.
 - Table AA identifies a total of 44,970 homes, exceeding the target by 9,510 homes.
 - Specifically in relation to Site 67, the capacity calculation has been based on a 3.45 ha site with low PTAL supporting urban densities of 170 homes per ha (assuming that 40% of the site is non-residential) ($3.45 \times 170/100 \times 60 = 352$ homes).
 - This does not reflect the removal of the 60:40 split, and therefore should be revised accordingly, in order for the plan to be considered positively prepared.
- **EXAM 75** – LBB Note on Site Allocations
 - The document proposes a series of additional further modifications.
 - Para 137 confirms that the Council proposes to add the following modifications to the *Site Requirements and Development Guidelines* at Site 67 *“This site lies on the Strategic Walking network. Development proposals should take the opportunity to ensure effective connectivity to this network and to improve the existing footpath”*.
 - We confirm that we are happy to accept this proposed modification.
 - Paras. 150 and 151 respond to the Inspectors request to liaise with the developer on the design led approach that can support increased capacity on the basis of reduction in main town centre uses (including timescales for commencement and build out trajectory. The Council states:
 - *“The development partner and Council are exploring how a number of the town centre uses can be re-provided within the redevelopment of North Finchley. The Council is currently undertaking consultation on the relocation of the Lido and the findings of this are not yet available. This, and other investigative work, is ongoing. However, the Council and Development Partner are confident that the indicative capacity for this site remains achievable. Initial proposals demonstrate that taking account of site constraints and opportunities,*

including the introduction of sustainable travel options, enhanced pedestrian connectivity to Glebelands, and exploring opportunities to provide reduced quantum of commercial/leisure/community uses on the site, that there is capacity for a significant quantum of homes on the site.”

- The existing town centre uses on the site are not protected by planning policy, and will result in a significant part of the site being available for residential redevelopment.
- Discussions regarding development options for the Leisure Centre are ongoing, which may enable even more comprehensive development of the site.
- *“The Development Timeframe of 6-10 years is not disputed by the Developer Partner, and this is reflected in the Council’s overall trajectory (EXAM87). The Council proposes that changes to the site requirements and development guidelines are reflected in a proposed modification to the plan.”*
 - The Hearing Statement associated with the site confirmed that it would be reasonable to assume that some of the early phases of development could be delivered within years 0-5, with later scheme phases being delivered over the 6-10 year period.
- The only modification proposed to MM3999 is the first sentence, which is proposed to be amended to:
 - *“Tall (but not Very Tall) Buildings may be appropriate, however, all tall building proposals will be subject to a detailed assessment of how the proposed building relates to its surroundings ~~(with height of neighbour buildings being of foremost consideration)~~ responds to topography, contributes to character, relates to public realm, natural environment and digital connectivity. Further guidance will be provided by the Designing for Density SPD.”*
 - No changes to the site capacity are proposed in EXAM 75, despite our representations to LBB on 17th November 2022. As such, we consider that the allocation as drafted is not positive prepared, or in accordance with London Plan Policy D3, as it does not build on the significant opportunity the site presents to deliver new homes and sustainable optimised development.
- EXAM 86 – LBB Note on Housing Trajectory
 - The document was prepared in response to issues raised by the Inspector, including recalculating supply of allocations with some sites excluded to provide conservative 5 year supply estimate (noting Site 67 is not removed), and setting a revised baseline year (2022/23).
- EXAM 87 – LBB Revised Housing Trajectory March 2023
 - The document identifies Site 67 as delivering 176 homes in 2029-30 and in 2030-31, a total of 352 homes.

- Our comments above regarding the delivery of additional homes on the site should also be reflected in the Council's revised Housing Trajectory.

Developer's Position on Latest EXAM Documents

We are disappointed to find that EXAM 75 and EXAM 86 do not identify any changes to numbers in Site Allocation 67, despite providing further information to the Council following the Hearing Session for Matter 10.

The Council have advised that the draft Local Plan supports masterplanning at the site as part of comprehensive redevelopment and that will impact on the capacity of the site.

We remain concerned that the basis of the evidence base behind the indicative capacities is not fit for purpose, which relies on the superseded London Plan (2016) density matrix, rather than the current London Plan (2021) approach to optimising sites through the design led approach (Policy D3). Retaining the indicative homes at 352 homes does not represent the optimisation of land, specifically making as much use as possible of previously developed / brownfield land as required by the NPPF (Paragraph 119).

As a minimum, as a result of the removal of the 60:40 split between residential and commercial/leisure/community uses, using the density matrix approach the minimum capacity of the site should be equivalent to 587 homes, when in reality, taking the design-led approach to optimising site capacity, the site can comfortably accommodate 1,000 to 1,200 homes.

We request that our previous representations are taken into account to significantly increase the indicative site capacity figure for Site Allocation No.67, in order to make the evidence plan justified, and the Plan sound.

Yours sincerely

[Redacted signature]

**Rachel Crick
Director**

[Redacted contact information]

For and on behalf of Avison Young (UK) Limited

cc. Ian Kemp, Programme Officer [sent via email idkemp@icloud.com]