

London Borough of Barnet Local Plan – Examination Inspectors’ Matters, Issues and Questions for Hearing Sessions - Autumn 2022

Matter 10: Site Allocations

Issue:

Whether the proposed allocation of sites in the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan?

Questions:

- 1) Are the proposed site allocations appropriate and justified in the light of potential constraints, infrastructure requirements and adverse impacts?

Yes, the proposed site allocations are appropriate and justified. The Local Plan’s approach to site selection is set out in the Council’s Response to the Inspector’s Initial Letter (EXAM1A). This document covers the approach of the Sustainability Appraisal / Integrated Impact Assessment; site selection methodology; approach to flood risk; and, assumptions on site development capacity given infrastructure dependencies and other site constraints. In addition the Council have produced a Housing Technical Paper (EXAM 1B), which has more fully addressed these issues.

Further detail on constraints and infrastructure requirements of Local Plan proposals is set out in the Strategic Sites Delivery Technical Paper (EXAM 9).

- 2) Is there any risk that any infrastructure requirements, site conditions and/or constraints might prevent or delay development or adversely affect viability and delivery?

As highlighted above these issues are addressed by the Strategic Sites Delivery Technical Paper (EXAM 9). The individual assessments of Local Plan site proposals are based on existing knowledge of site conditions, constraints and infrastructure requirements. The Local Plan is supported by an up-to-date Infrastructure Delivery Plan (Core_Gen_19) and a Viability Assessment (Core_Gen_01) produced in 2021. The Council refers to its response to Matter 7 Q1 with regards to up-to-date evidence on viability.

- 3) Are the site allocation boundaries justified?

Yes. Proposals sites are the product of a long selection process which is detailed in paras 16.1.2 and 16.1.8 of the Local Plan. This provides a

complete precis of the site selection process that has been undertaken. Annex 1 of the Local Plan sets out the source for the proposals and highlights those sites that already form part of existing planning documents and indicates how long these sites have been in the public domain. The Council has made revisions to correct site boundaries where it has been practical to do so ie Park House (Site 26) in response to representations from the Finchley Society at Reg 18 (Core_Gen_27). The Council also refers to Proposed Modifications (MM324 and MM329) where it has withdrawn Proposal Sites 6 – Watling Avenue and Site 9 – Colindeep Lane in response to representations at Reg 19 stage (Core_03). At Reg 19 stage in response to representations at Reg 18 stage (Core_Gen_27) the Council removed 2 sites (Site 17 – Danegrove Former Playing Field and Site 37 – Middlesex University Car Park).

- 4) Are the assumptions regarding the capacity of the sites in terms of density of development and net developable areas justified and what is this based on?

Yes. The Council refers to a suite of documents to support its approach on calculating residential capacities. It signposts paras 30 to 37 of the Council's Response to the Inspector's Initial Letter (EXAM1A) with regards to assumptions around development capacities. Section 4 of the Housing Technical Paper (EXAM 1B) provides further detail on calculations whilst the Strategic Sites Delivery Paper (EXAM 9) provides an up-to-date assessment of the indicative development capacity for residential uses. All sites with proposed residential uses in Local Plan Annex 1 set out the components required for calculating residential capacities through the Density Matrix in terms of size, PTAL and context.

- 5) What is the expected timescale for development in terms of lead in times and annual delivery rates, and are these assumptions realistic and supported by evidence?

Yes. The Council has a long track recording of revising and producing pragmatic Housing Trajectories, reflecting the high growth expectations of Barnet - the 4th highest housing target in London Plan (Core_Gen_16).

The Housing Trajectory (EXAM 10) represents a realistic timescale for development over the next 15 years, reflecting extensive knowledge on development activity and expectations on proposal sites timeframes. This is also set out in the Strategic Sites Delivery Technical Paper.

The Council is able to meet in full its objectively assessed identified housing need and is able to demonstrate a five year housing land supply of deliverable sites. The Council defended its position on the 5 Year Supply at the Barnet House Planning Appeal (Appeal Ref: APP/N5090/W/21/3289161).

As highlighted in the Housing Technical Paper (EXAM 1B) the Housing Delivery Test 2021 shows that Barnet met its need at 108% of the requirement, and therefore there are no consequences for LBB in terms of presumption in favour of development, provision of a buffer, or preparation of a Housing Delivery Action Plan (HDAP).

Barnet has significantly improved delivery of housing over the past five years with completions steadily moving beyond the London Plan target. This progress may be at risk as a consequence of the strategic problems faced by housebuilders. The 2021 HDAP (EB_H_10) published in December 2021 signposted the significant challenges for housing construction. In December 2021 these largely arose from the impact of the COVID-19 pandemic in terms of increased demands for building materials, mainly generated by home improvements, at a time when there have been shortfalls in production. Supply chain issues and associated rising costs have been compounded by Brexit particularly in terms of labour shortages in the construction industry. These issues are impacting on housing delivery across the country. In addition, inflationary pressures arising from increased energy costs and global economic uncertainty as a result of the conflict in Ukraine have added to the challenges of delivering new homes. The response to these significant global and national challenges is beyond the scope of a local authority HDAP.

- 6) Does the Plan sufficiently make clear the infrastructure requirements for each of the allocated sites, together with the timing of and dependencies upon such infrastructure for their delivery ?

Yes. The Schedule for Proposals makes it sufficiently clear in 'Site requirements and development guidelines' what the expectations are of supporting infrastructure.

- 7) Are the proposed allocations and the associated development requirements and principles identified in Annex 1 of the Plan - justified, effective, consistent with national policy and in general conformity with the London Plan?

Yes. With the addition of the Proposed Modifications (EXAM 4) the sites within Annex 1 meet the tests outlined in para 35 of the NPPF and are therefore considered to be sound. The proposals are also in general conformity with the London Plan. This is evidenced by the Strategic Sites Delivery Technical Paper (EXAM 9).

- 8) Are any further modifications required to ensure that the relevant policies for each site and/or their development requirements identified in Annex 1 are accurate and sound?

The Council does not intend to make additional Further Modifications to Annex 1.