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Our Ref: 21/263

Tuesday, 06 September 2022

Dear Sir/ Madam,

LAND TO THE SOUTHEAST OF BARNET GATE, BARNET
WRITTEN REPRESENTATIONS ON THE STAGE 2 WRITTEN STATEMENTS

Iceni Projects Ltd have been instructed by Mactaggart & Mickel Group to prepare representations on the London Borough of Barnet for Stage 2 Written Statements.

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.

These representations should be considered alongside those submitted at earlier stages of the Local Plan preparation.

a. Background

Soda Holdings Limited is the registered owner of the land to the southeast of Barnet Gate, Barnet. Mactaggart & Mickel are making these representations with a view to developing the land to the south-east of Barnet Gate to deliver a family-led housing scheme. The scheme will comprise of approximately 500 homes that will embrace the latest forms of environmental technology to combat climate change. The new homes will be offer generous amounts of open space; provide modern infrastructure for home-working and provide access to a range of wider services and facilities in Barnet, Edgware and Borehamwood. The emphasis will be on beauty, placemaking and positively responding to the local area.

A site location plan is attached at **Appendix A1**.

b. About Mactaggart and Mickel

Mactaggart & Mickel was founded in 1925 in Scotland. They are a fourth-generation family company, with family values and long-term goals. In 2021, Mactaggart & Mickel received a prestigious Five Star rating for customer satisfaction from the Home Builders Federation (HBF).

As well as shaping new communities in Scotland, Mactaggart & Mickel has more recently shaped projects in Oxfordshire and London and has several projects in North America (Chelsea in Manhattan and Williamsburg in Brooklyn). In 2017, Mactaggart & Mickel opened an office in south-west England, following a London-based division in 2020, demonstrating their commitment to projects in the south-east and south-west of England.

Mactaggart & Mickel is a leading property company that has strong and diversified foundations. Its governance structure allows it take entrepreneurial decisions and to break the status quo. They have an enthusiasm to implement new sustainable technologies, reduce the dependence on the private motor car and encourage new start-up entrepreneurial businesses.

Mactaggart & Mickel are committed to supporting the London Borough of Barnet through the plan-making process. The professional team will work alongside both officers and elected Members at the London Borough of Barnet to create a place that reflects local design policies and provides a shared sense of pride and commitment to longevity.

c. Comments on Inspectors' Matters, Issues and Questions (Stage 2)

Mactaggart & Mickel would like to make the following comments on the Matters, Issues and Questions Raised by the Planning Inspector. The question numbers listed below correlate with those contained within the consultation document.

Matter 11: Delivering the Identified Requirements over the Plan Period

Issue:

Whether the Plan approach towards the identification and supply of land and anticipated delivery of development is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan, so as to ensure the timely delivery of the identified requirements for the Borough?

Questions:

- 4. Is the most up-to-date version of the housing trajectory in the Plan realistic? Is there sufficient evidence to demonstrate a sufficient supply of deliverable sites (in years 1 to 5) and developable sites (in years 6 to 15) to ensure that the Plan's housing requirement for the Borough would be met?**

The Examination Library for the Local Plan provides a Housing Trajectory. This shows that over the last 12 years the Council has delivered completions at a rate of approximately 1,400 homes per annum. The highest ever achieved in this period was 2,000 homes in 2017/18.

Notwithstanding this council-prepared long-term completion data, the Housing Trajectory shows for next 12 years the completion rates rise to approximately 2,858 homes per year. This is a 104% increase. The Council are forecasting that in 2024 / 25 there will be 3,621 homes completed in a single year.

In the context of the above, Mactaggart & Mickel do raise concerns over the robustness of the Housing Trajectory, particularly as many of the larger sites are dependent upon land assembly and have a reliance on new or upgraded infrastructure.

- 6. Is there any clear evidence that sites within the supply should not be considered deliverable within 5-years?**

As raised by other parties as part of the previous consultation there are parts of the Borough that are at risk of flooding from a number of sources, including fluvial flood risk associated with the River Brent, River Lee, Silk Stream, Dollis Brook, Deans Brook, Burnt Oak Brook, Mutton Brook, Edwarebury Brook and Folly Brook, and surface water flood risk. The submitted

Strategic Flood Risk Assessment (SFRA) Level 1 (document EB_GI_15) and Level 2 (document EB_GI_19) taken together confirm that there are eight proposed site allocations at risk from medium to high fluvial flooding and a further ten sites assessed due to the significance of surface water flood risk.

The above is evidence that questions remain over the deliverability of proposed site allocations.

7. Is there reasonable confidence that a 5-year supply would be maintained throughout the Plan period? If not, how could this be achieved?

As set out in our response to Question 5 and 6 there are some concerns around both the robustness of the housing delivery rates but also some of the site-specific challenges. Consequently, there is concern that the 5-year housing land supply will not be maintained throughout the Plan period. Contingency should be built into the plan and “reserve” sites should be included within the Local Plan.

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?

The COVID19 pandemic has prompted changes in our preferences to living. People are now spending longer at home due to amended working practices. For example, TUI are advising staff to spend just one day in the office per month going forwards. Similarly, companies such as PwC, Lloyds Banking Group, Virgin Media and Centrica are all openly moving towards a hybrid way of working. The direct implication of this is people are reconsidering where they live. Unsurprisingly, the desire for more space and the declining importance of an easy commute are key determinants. What this means in terms of housing mix is people are increasingly looking for an extra bedroom as a workspace environment and outdoor space.

This is particularly relevant in the context of Paragraph 5.5.10 of the *Barnet Draft Local Plan (Reg 19) 2021 to 2036*. This confirms that housing trends in Barnet are at variance with the wider London requirement insofar as it relates to housing mix. The Mayor’s Strategic Housing Market Assessment (SHMA) 2017 highlights that one bedroomed units are the largest requirement for market as well as social rented housing in London. This contrasts with the findings of Barnet’s SHMA published in 2018, which confirms a requirement for family housing. The largest market housing requirement in the London Borough of Barnet is for 3-bedroom homes and, thereafter, for 4-bedroom properties. This is summarised in Figure 2 and 3.

Figure 2 – Required Market Housing in Barnet (extract from Local Plan)

Unit Size	Market Housing
1-bedroom	6%
2-bedroom	24%
3-bedroom	40%
4-bedroom	25%
5-bedroom	5%

Figure 3 – Actual Completions in Barnet (taken from the AMR)

Unit Size	Market Housing	Variance
1-bedroom	40%	+ 566%
2-bedroom	26%	+ 8%
3-bedroom	16%	- 60%
4-bedroom	9%	- 64%
5-bedroom	9%	+ 80%

Previous iterations of the Council’s Authority Monitoring Report (AMR) highlight the challenges facing Barnet. It has seen a significant increase in change-of-use applications due to amendments in Permitted Development Rights. This has resulted in a greater proportion of flats being delivered and often below space standards.

The Council has identified a number of strategic regeneration projects within its emerging Local Plan. This includes the Brent Cross Opportunity Area, which has been identified for the delivery of 7,500 homes and supporting employment over the plan period. The first phases of housing delivery have already been consented and construction has now commenced. These are providing approximately 33%, 1-bedroom flats / studio / 57%, 2-bedroom flats and 10% 3 / 4-bedroom flats (Ref. 17/6662/RMA). This housing mix does not align with that identified in the emerging Local Plan.

In addition to the above, the Council are proposing 5,400 homes in town centre locations / 1,650 homes on new transport hubs / 1,400 homes in Cricklewood town centre and 3,350 along major road corridors. The emerging Local Plan policies also support the delivery of 8 to 14 storey buildings in these locations. As such, these growth areas are likely to have a strong emphasis towards high-density flat-led residential typologies. By contrast, the only area where sub-urban growth is identified is in Mill Hill East, which is projected to deliver 1,500 homes.

This heavy dependence upon high-density apartment living does not align with the overarching vision of the emerging Local Plan (as set out in Paragraph 3.1.1), which is to “be a place that is family friendly”; “a place where people choose to make their home”, and a place with a “range of housing types”. Paragraph 6.2.2 sets a bold target of being “the most family friendly place in London” but it is unclear how this strategic objective will be delivered.

In the context of the above, Mactaggart & Mickel continue to have concern that the emerging Local Plan fails to provide the size and type of housing that is required over the plan period.

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?**

The emerging Local Plan makes provision for 340 windfall sites per annum, which falls below the London Plan target of 434 new homes. Whilst this is positive insofar as it’s been based on historic trends it does highlight that the Local Planning Authority cannot be reliant on the smaller windfall sites to deliver the overall housing objectives, should the larger sites fail or take longer than envisaged to deliver.

As set out in the Council’s Housing Technical Paper the Local Planning Authority has taken a binary approach to Green Belt and simply not considered them – even in the event that contingency sites are required. The Technical Paper states: “The Council did not consider that it would be an appropriate use of resources to set out and assess options that had no realistic

chance of progress – for example sites which would require the removal of land from the Green Belt”.

The National Planning Policy Framework is clear that the preparation of the Local Plan is the appropriate time to consider Green Belt boundaries. Paragraph 140 and 141 sets out a clear methodology for reviewing, which should be plan-led.

d. Conclusion

The emerging Local Plan is framed in the context of a pre COVID-19 environment. It seeks to respond to the demise of traditional retail and the changing landscape of town centres. It promotes high-density apartment-led living in areas with a strong public transport network. Whilst there is obvious role for this form of development the emerging Local Plan does need to provide balance within its strategic policies.

Mactaggart & Mickel also have concerns over the projected housing trajectory for the Borough. Future delivery rates are heavily inflated when based on long-term historical delivery rates. A significant number of schemes are also dependent on land assembly, infrastructure provision and will need to overcome on-site constraints such as flooding.

In accordance with national policy, the emerging Local Plan should respond to needs over the plan period. And, for the Local Plan to be found sound under the four tests of soundness as defined by the NPPF the Local Plan must be positively prepared, justified, effective and compliant with national policy.

Thank you for the opportunity to respond to the Stage 2 Written Statements of the Local Plan. We would be grateful for confirmation of the receipt of these representations and would welcome the opportunity to discuss the site and the contribution it can make to sustainable development of the Borough.

Yours sincerely,



James Bompas MBA MRTPI
Director

Appendix 1 – Site Location Plan

