

Local Plan Consultation  
Planning Policy Team  
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16 March 2020

Dear Sir / Madam

### **Barnet Council: Local Plan Consultation: Regulation 18**

Thank you for the opportunity to comment on Barnet Council's Regulation 18 consultation version of its Local Plan. The following representations are made by the HBF.

The Home Builders Federation (HBF) is the representative body of the home building industry in England and Wales. The HBF's member firms account for some 80% of all new homes built in England and Wales in any one year, and include companies of all sizes, ranging from multi-national, household names through regionally based businesses to small local companies. Private sector housebuilders are also significant providers of affordable homes, building 49% of affordable homes built in 2018/19.

HBF would like to participate in the future examination-in-public of the new Local Plan. James Stevens will be the HBF's representative. His contact details are at the foot of these representations.

### **Barnet's Development Plan**

Paragraph 1.2.1 states that the Local Plan will operate over the period 2021-2036.

It would be helpful to put this plan period on the front cover.

However, we query why Barnet has chosen to adopt a different date series to the Draft London Plan. The Council should bring its Local Plan into conformity with the Draft London Plan and work on the basis of the time period 2019/20 to 2028/29.

Despite the guidance in the NPPF, there is no point in planning beyond 2028/29 because the housing and employment land supply is uncertain beyond this date (see the Panel report on the Draft London Plan at paragraphs 150-152). As the Panel concluded, rolling-forward the existing target would not be effective.

The London Plan will need to be updated by 2024 for adoption in 2025. Barnet should be prepared to update its Local Plan in line with the new London Plan so that it can slot into place as quickly as possible after this date.



## **Policy BSS01: Spatial Strategy for Barnet**

While we acknowledge Barnet's positivity and ambition in planning for the longer term up to 2036 Part a) should be revised to bring the housing target in line with the time series in Table 4.1 of the Draft London Plan – namely for the plan to operate over the period 2019/20 to 2028/29.

### **Barnet's Growth Requirements (page 29)**

#### Paragraph 4.3.5

The Draft London Plan Intend to Publish version requires Barnet to provide 23,640 net additional homes between 2019/20 and 2028/29, or an annual average of 2,364.

We note that the Council has referred to the sub-regional West London Alliance SHMA. This establishes an OAN for Barnet of 3,060 dpa. We acknowledge and welcome the Council's ambition to go further than the minimum targets in the Draft London Plan, although whether it has the deliverable land capacity to support this is another matter (we consider this below). We advise that the Council should use the figure of 3,060 as the basis for a ten-year plan rather than 15 years. This would require the plan to provide for 30,600 homes in total between 2019/20 and 2028/29 rather than 46,000 over 15 years.

The Council's intention to deliver in excess of the minimum Draft London Plan target is supported by the Secretary of State's directed change number 8, with its modification to para. 0.0.21.

### **Delivering sustainable growth**

We note Table 5. HBF's welcomes the Council's aim to 'frontload' housing delivery and not rely on more homes being delivered towards the end of the plan. The fact that the Council might be able to deliver 33,750 homes in the first ten years of the life of the Plan – a figure that would exceed the OAN requirement for 30,600 homes – indicates that it would be reasonable to plan for ten years rather than 15.

However, the base date of the Local Plan should be the same base date as the Draft London Plan – 2019/20.

We welcome and strongly support the Council's intention, as articulated in para. 4.7.5, to keep the housing land supply and trajectory under review. This review will help to inform a revision to the Local Plan in five-year's time.

### **Figure 3 – Barnet's Housing Trajectory 2021/22 – 2035/36**

The housing trajectory should use the OAN housing requirement figure of 3,060 dpa, rather than the Draft London Plan figure of 2,364 dpa.

Table 5 indicates that 16,950 homes in total can be delivered in the first five years of the plan (2021/22 – 2025/26). This would equate to an annual average of 3,390 homes. This does not appear to be reflected in the Trajectory as only two bars on the chart showing projected completions exceed the 3,000 mark. This suggests that the Housing Trajectory is based on the Draft London Plan targets (as para. 4.7.5 states) while Table 5 is merely demonstrating the Council's own local aims.

This will need to be clarified to avoid confusion. This may be because the Housing Delivery Test requires that local authority performance in terms of housing delivery is monitored against the most up-to-date London Plan targets. The Council should clarify this, but a trajectory is needed to show how the Council intends to deliver the Local Plan housing requirement even if its performance by Government will be measured against the London Plan target.

### **Small sites**

Table 5 indicates that some 3,400 homes could be provided on small sites, or 5,100 over 15 years.

Policy H2 of the Draft London Plan aims to increase the supply of small sites to support smaller developers, especially in the outer London boroughs. Table 4.2 of the Draft London Plan Intend to Publish version establishes 10-year minimum targets (2019/20 -2028/29) for net housing completions on small sites (below 0.25 hectares in size) for each London planning authority. For Barnet, the ten-year target is a minimum of 4,430 homes. This is about 1,000 homes higher than the number that The Council anticipates providing on small sites.

HBF strongly recommends that the Council aligns with the Draft London Plan Intend to Publish small sites target. Increasing the number of small sites by identifying these and allocating them in the Local Plan will be key to improving the pace of housing delivery across Greater London and the nation. Allocating a more diverse range of sites, both in terms of size and location, will help diversify production, diversify build types, and increase competition among housing providers. This will help improve build-out rates and, hopefully in the long run, improve affordability. This is something that the Government has come to realise through the Letwin Review.

National policy now requires all local planning authorities to identify land of one hectare or less to accommodate at least 10% of the overall housing requirement (NPPF, para. 68). For Barnet, that would require land for at least 3,060 homes to be provided on small sites of one hectare or less over the ten-year life of the Local Plan.

Table 5 suggests that the national policy requirement is achievable but that the Draft London Plan Intend to Publish small sites target may not be achieved. Second, it is unclear how this small site figure has been derived. Is this a small site assumption based on past windfall trends (as the Draft London Plan target is derived), or is it underpinned by actual land allocations? If it is a windfall trend, then HBF would strongly caution the Council against an assumption that this will satisfy the new requirements of national policy. Identifying and allocating land that is appropriate for residential development in the Local Plan is critical to supporting the growth of SME developers, since one of the chief financial obstacles small builders face is trying to establish the principle of residential development on sites not allocated in local plans.

We have noted the background paper called *Site Selection Background Report*, December 2019. It is interesting that this paper does not refer to para. 68 of the NPPF and its requirement that 10% of the housing requirement is delivered on sites of one hectare or less, or 0.25 ha in the case of London. Para. 3.3.6 refers to the Council operating a site threshold of 0.1 ha to identify small sites. It is unclear from appendix 2 – the list of sites considered deliverable and developable – which of these are the sites that fall within the 0.1ha and 0.25ha window. These are precisely the sort of site sizes that should be allocated in increasing numbers to enable London's housing targets to be achieved.

Without an allocation it is much harder to secure a planning permission. Without a planning permission it is nearly impossible for SMEs to secure finance from banks and other lenders. Banks will rarely lend until a developer has a full, implementable, planning permission. As SMEs cannot afford to spend money promoting sites through the planning system this is one of the chief reasons why the number of SMEs has collapsed by 80% since the inception of the plan-led system in 1990.

## **Affordable housing**

We note in paragraph 5.4.6 that the sub-regional SHMA has assessed a high need for affordable housing – some 23% of the total need, or 10,600 homes by 2036. We note that the Council intends to adhere to the Draft London Plan threshold policy approach to help deliver more affordable housing. This is sensible. HBF hopes that the Council will monitor the effectiveness of this policy mechanism. This could help to improve the supply of affordable housing across Greater London.

## **Housing choice for vulnerable people**

### Providing older persons housing

Table 4.3 of the Draft London Plan establishes annual borough benchmarks for specialist older persons housing for the period 2017-2029.

HBF would like to see the benchmark target for Barnet reflected in a separate and specific policy in the Barnet Local Plan- i.e. that the council will aim to deliver 275 units of specialist older persons housing each year. Although London is a relatively young city, the GLA expects those aged 65 and over will increase by 37% over the next decade. The Council identifies a growing need for specialist accommodation for older people of all types in Barnet (para. 5.7.2). National planning policy places a strong emphasis on improving the supply of older persons housing (NPPF, para. 61). The supply of such homes will also contribute to diversifying housing types and this will help to improve build-out rates.

Reflecting the Draft London Plan benchmark target does not mean that this target will become a 'binding' target that has to be delivered by the local authority. Instead it will provide the Council with something to aim for, and to monitor its performance against. However, to avoid the benchmark target being ignored, we recommend that the new policy states that a 'presumption in favour' of older persons housing schemes will come into effect if the benchmark target has not been achieved in the previous year.

The Council should record the delivery of specialist older persons housing as part of its Annual Monitoring Report.

## **Transport**

Table 23 – Residential Car Parking Standard – will need to be updated in line with the Secretary of State's directed changes to the Draft London Plan.

Part f) requires that electric vehicle charging points are provided in line with the Draft London Plan.

Despite what the Draft London Plan says, HBF would advise against making policy in this area owing to several complications. HBF prefers a national and standardised

approach to the provision of electrical charging points in new residential developments. We would like this to be implemented through the Building Regulations rather than through local planning policy.

If the Council does choose to make policy in this area there are several issues that it will need to consider carefully.

The Council's work should be supported by evidence demonstrating the technical feasibility and financial viability of his requirements. Any requirement should be fully justified by the Council including confirmation of engagement with the main energy suppliers to determine network capacity to accommodate any adverse impacts if all, or a proportion of dwellings, have charging points. We argue this because if re-charging demand became excessive there may be constraints to increasing the electric loading in an area because of the limited size and capacity of existing cables. This might mean that new sub-station infrastructure is necessary.

There are also considerable practical difficulties associated with provision to apartment developments or housing developments with communal shared parking rather than houses with individual on plot parking. If residents do not run cars, let alone electric cars, they would be forced to pay for the electricity consumed by electric car owners as this cannot be apportioned to the electric car owner. This would be unfair on non-car users. This will be an important consideration as the Local Plan requires the construction of flats as the most common residential type.

The NPPF requires that any policy, including a requirement for charging points, should be clearly written and unambiguous (para 16). The policy will need to specify the quantum and type of provision sought either AC Level 1 (a slow or trickle plug connected to a standard outlet) or AC Level 2 (delivering more power to charge the vehicle faster in only a few hours) or other alternatives.

Part g) – the council states that car club spaces should be provided. It should clarify if this is also a requirement for car-free developments in PTALs 5 and 6.

Part g) also specifies that car club membership should be provided for future residents of the development. The Council will need to clarify its intentions here. Is this for both new and existing residents? Does this include children too? How will the applicant be expected to calculate the number of future residents? How does the Council expect to calculate the financial implication of this for its viability appraisal? For example, Enterprise Car Club advertises an annual membership fee of £60.

## **Viability**

We were unable to locate a viability report among the supporting papers. We assume this is because this is still work-in-progress and it depends very much on the outcome of this consultation. This is sensible.

As advised by planning guidance, HBF and the development industry would welcome the opportunity to meet with the Council to discuss the assumptions that will inform that appraisal, in an endeavour to secure as much agreement as possible on key factors such as benchmark land values, development costs, profit margins etc. This would help to reduce the number of potential areas of dissent at the examination stage.

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I hope these comments will be useful in helping the Council prepare the next iteration of the Barnet Local Plan.

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