



## Note

# PROPOSED MAIN MODIFICATIONS TO SUBMISSION DRAFT (MAY 2024) BARNET LOCAL PLAN REPRESENTATIONS – JUNE 2024

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## 1 Introduction

- 1.1 These representations are made by Quod and Stories on behalf of Bunns Lane Developments Ltd in respect of land adjacent to Mill Hill Broadway Station, Bunns Lane (hereafter referred to as the 'Site').
- 1.2 The Site is identified as Site Allocation 33 for a “residential led mixed use development”. Bunns Lane Developments Ltd is committed to working alongside the Council to deliver a Build to Rent (BtR) scheme on the Site. The specific details of the scheme are still emerging and will be subject to a pre-application engagement process with the Local Planning Authority.
- 1.3 Bunns Lane Developments Ltd note that Annex 1 sets out an indicative residential unit number for the Site based on a series of crude assumptions, but that the actual site capacity will be subject to detailed design and testing consistent with London Plan Policy D3 and emerging Policy CDH01 which seeks site optimisation through a design led process.
- 1.4 The growth planned at Bunns Lane Car Park contributes to the overall spatial strategy for the Local Plan. Whilst Bunns Lane Developments Ltd is generally supportive of Barnet’s proposed Main Modifications, more clarity could be provided in some areas. In addition, it is considered that certain draft policies do not go far enough to respond positively to the Inspector’s recommendations.
- 1.5 Nevertheless, Bunns Lane Developments Ltd remain fully supportive of the Council’s growth plans at Bunns Lane and is confident that the matters raised in these representations can be addressed through selective refinements to the draft Local Plan. Bunns Lane Developments Ltd look forward to continued engagement with the Council.
- 1.6 Bunns Lane Developments Ltd’s representations to the proposed Main Modifications to the Submission Draft Local Plan are made in this context and are set out below.

## 2 Representations

### Draft Policy GSS01 (Delivering Sustainable Growth)

- 2.1 Chapter 4 of the Draft Plan sets out Barnet’s aim for delivering sustainable growth. This Policy sets out the conditions for sustainable growth to deliver homes, jobs, retail and leisure floorspace, open spaces and community facilities.
- 2.2 Paragraph E of Draft Policy GSS01 refers to updated housing figures of 5,010 and 6,510 homes. This appears to be an error and should refer to 5,130 homes as set out in Paragraph 4.8.4A of the Draft Local Plan. It reflects a range of between 5,130 new homes, based on historic delivery on developments of under 10 new homes, and the minimum target of 6,500 new homes based on London Plan Policy H2. Therefore the lower figure should be 5,130 rather than 5,010.



## Note continued

### Policy HOU02 (Housing Mix)

- 2.3 Policy HOU02 sets out that in order to deliver mixed and inclusive neighbourhoods the Council will support proposals which provide a mix of dwelling types and sizes. The policy refers to dwelling size priorities, and expects all housing schemes to include a proportion of family sized homes and reflect the dwelling sizes unless it can be robustly demonstrated to the contrary.
- 2.4 Bunns Lane Developments Ltd support the recognition in the policy that BtR schemes require a specific unit mix and cannot accord with borough-wide housing mix targets. The introduction of para 5.5.4A is also supported which clarifies stating *“in applying HOU02 to Build to Rent proposals the Council will consider the demand for new rental stock in accessible locations where Build to Rent is particularly well suited and it will have regard to viability in line with London Plan Policy DF1. This demand is typically much greater for one and two beds than in other tenures.”*

### Consistency Between Policy GSS09 & Policy GSS12

- 2.5 The final para of Policy GSS09 has been amended to correctly recognise that proposals involving the redevelopment of car parks should only provide replacement parking ‘where essential’ for example for disabled persons. This approach is consistent with the Council’s Climate and Biodiversity Emergency and draft Policies TRC01 and TRC03.
- 2.6 Policy GSS12 specifically deals with the redevelopment of existing car parks for residential and other main town centre uses. The policy should apply similar language to that added to Policy GSS09 by clarifying the expectation that replacement parking should only be provided ‘where essential’.

## 3 Summary

- 3.1 In summary, it is important that the emerging Plan contains policies that support and facilitate planned growth, specifically in those locations where significant growth is to be accommodated.
- 3.2 We consider that the above amendments should be made to the draft Local Plan to ensure it is technically sound. Bunns Lane Developments Ltd would welcome the opportunity to discuss these matters in more detail with the Council.
- 3.3 We trust that you will fully consider our client’s comments and ensure that any emerging policy does not prevent the successful regeneration of Bunns Lane Car Park from being realised.