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**Barnet Local Plan  
Examination  
Response to Matter 10: Site  
Allocations**

St William Homes LLP

6 September 2022

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## **1.0 Introduction**

- 1.1 This statement to Matter 10 (Site Allocations) of the examination of the Barnet Local Plan ('the Plan') is submitted by Lichfields on behalf of St William Homes LLP ('St William'). It follows the submission of representations to the Regulation 19 Draft Local Plan (June-August 2021).
- 1.2 St William have an interest in the former gas holder site located 21 Albert Rd, New Barnet, EN4 9SH, highlighted in the draft plan as New Barnet Gasholder Site No 21. The site is a redundant brownfield Gasworks site and in line with the NPPF is suitable and available for housing delivery, helping to meet the Council's housing growth objectives.
- 1.3 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.
- 1.4 The Council has prepared a schedule of proposed minor modifications that it wishes to make to the Plan. Reference is therefore made to the policies and paragraphs within the Plan version incorporating the schedule of minor modifications, unless otherwise stated.

## 2.0 **Response to Inspector's Questions**

### **Question 1: Are the proposed site allocations appropriate and justified in the light of potential constraints, infrastructure requirements and adverse impacts?**

- 2.1 Overall, the proposed allocation 21, New Barnet Gasholder, is appropriate and justified. The site is in the control of St William (a subsidiary of the Berkeley Group, which is renowned for delivering high quality residential development across London) and is free from any physical constraints to development. It is, therefore, a deliverable housing allocation. St William have complete ownership of the site and programme completion of homes within the Local Plan period.
- 2.2 The site has been identified as a suitable site for development since at least 2010 when it was identified within the New Barnet Town Centre Framework (NBTCF), as part of Opportunity Site 1. The remainder of the gasworks site to the south (outside of St William's ownership) already has planning permission for a residential-led mixed use development (ref. B/04834/14). However, as stated in paragraph 6.18.1, the draft Local Plan acknowledges that '*... as the Borough changes over the next fifteen years certain locations will evolve a different local character as tall and medium rise buildings are expected play a greater part in new development*'.
- 2.3 As such, given that the NBTCF is over 10 years old and the draft Local Plan looks ahead to the next 15 years, it is right to propose that the gas holder site will evolve a different character with tall and medium rise buildings playing a greater part in new development on such an accessible, brownfield edge of town centre site. This is also in line with the London Plan which states at 4.1.3 that '*The Mayor recognises that development of this scale will require not just an increase in the number of homes approved but also a fundamental transformation in how new homes are delivered*'.
- 2.4 The former gasworks site is located within New Barnet District Town Centre, in close walking distance (approx. 7 minutes' walk) to the town centre shops and services, and New Barnet Train Station. The site is therefore in an accessible sustainable location, which has long been identified as suitable for residential use and which could deliver sustainable development. Its allocation is consistent with the London Plan Policy H1, which seeks to optimise the potential for housing delivery on all suitable and available brownfield sites through Development Plans, especially those which are located within 800m of a train station or town centre boundary.
- 2.5 It should be made clear in the allocation that mid-rise development will be appropriate at this location and that there may be the potential to explore the scope for a tall building on the site.

### **Question 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?**

- 2.6 No, there are no risks that would prevent the New Barnet Gasholder coming forward for development.

- 2.7 The site forms part of a redundant gasworks and, although these sites are more challenging and expensive to regenerate compared to other brownfield sites, St William specialise in the delivery of high-quality residential development on former gasworks sites. Since 2014, St William has been granted planning approval for 13 former gasworks sites, totalling approval for more than 9,000 new homes, of which just under 5,000 are currently under construction. These consents include Leven Road Gasworks (2,800 homes), Battersea Gasworks (955 homes), Clarendon Gasworks (1,714 homes) and Fulham Gasworks (1,843 homes). St William as part of the Berkeley Group have a tangible successful track record for homes delivery on former gas works sites.
- 2.8 Former industrial and vacant urban brownfield sites, such as the Albert Road Gasworks have a critical role to play in the delivery of needed homes in London. The London Plan specifically identifies former utilities sites (including gasworks) as a strategic brownfield source to deliver housing, reflecting the NPPF's emphasis on making the most effective and efficient use of brownfield land for housing supply. St William are highly experienced in overcoming the technical challenges that former gasworks sites present and are well placed to deliver a high-quality development at the site.

**Question 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?**

- 2.9 Barnet's Housing Technical Paper (document EXAM1B) confirms that a density matrix, set out in Annex 1 Figure 1, was used to determine indicative densities for the site allocations. Paragraph 4.3 of this document confirms that '*indicative capacities within proposals are intended as high-level assessments that will be firmed up by further design and master-planning work as proposals transition to planning applications*'. This is an acceptable first approach, but as part of the land process more design work and technical analysis has now been undertaken with regard to the New Barnet gasworks site and it is considered that the site offers a greater potential to deliver more of the new homes required in the Borough via a design led approach. It is considered that, where possible, more accuracy should be included in a Local Plan regarding a site's potential and, in other representations to the EiP, we have already identified the suitability of this site to accommodate growth.
- 2.10 In the initial letter to the Council (EXAM1), the Inspectors raised concerns around the consistency of this approach with London Plan Policy D3 and the design-led approach to optimising capacity. St William share these concerns; as part of the Berkeley Group, St William's driving purpose is to create high quality homes, strengthen communities and improve people's lives through fantastic placemaking. St William places great emphasis on high quality design; they create bespoke masterplans which are designed in collaboration with local stakeholders so they have clear community influence and support and reflect local views and aspirations. St William do not have a range of standard products, instead each site is delivered with a design led approach responding to the individual opportunities and constraints that exist on each site. As such, the capacity of each site should be determined through a design-led process; this is set out in Policy CDH01, rather than through a simple density calculation.

2.11 As stated above, initial design work and site analysis undertaken by St William has identified that the New Barnet Gasholder site could deliver around 300 homes, as opposed to the 201 homes currently shown within the allocation.

2.12 In this case, to make the plan sound, it should be confirmed that mid-rise development would be appropriate, that there may be scope for a tall building and that an indicative figure of 300 homes should be shown for the New Barnet Gasworks site, as this is based on a design-led approach.

**Question 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?**

2.13 A development timeframe of 6-10 years for the Barnet Gasholder site is provided in the allocation. The site is in the ownership of St William who have committed to delivering homes within the local plan period and therefore fully support the 6-10 year forecast for completions.

**Question 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?**

2.14 As stated above it should be made clear that the site is suitable for mid-rise development and may be appropriate for a tall building. St William welcome the proposed modification to the plan that replaces the requirement for 5% community floorspace with the wording '*Residential development with small quantum of community uses*'. In order to allow further flexibility, the following amendment is suggested: '*Residential development with potential for small quantum of community uses*'.



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