



Note

LB BARNET LOCAL PLAN EXAMINATION WRITTEN STATEMENT (ID058) - MATTER 4

1 Introduction

- 1.1 This Written Statement has been prepared by Quod on behalf of Hammerson UK Properties plc and abrDN (“H/abrDN”) in response to questions raised under Matter 4 “Planning for the Borough’s Economy, including Employment, Retail and Other Main Town Centre Uses” within the Inspectors’ Matters, Issues & Questions (“MIQs”) in respect of London Borough of Barnet’s (“LBB”) Draft Local Plan Examination in Public (“EiP”).
- 1.2 H/abrDN are the long leaseholders of Brent Cross Shopping Centre and surrounding land, and have been working with the Council and key stakeholders over the last two decades to facilitate its revitalisation as part of the wider Brent Cross Growth Area.
- 1.3 Given economic uncertainties in the retail market, H/abrDN took the decision to delay the delivery of Phase 1A (North) and Phase 1B (North) of the 2014 Planning Permission. Although originally hoped that this delay would be temporary, the changes that have occurred to the retail sector are so significant that it calls into question the appropriateness of a retail led development north of the A406.
- 1.4 H/abrDN remain committed to enhancing the existing Shopping Centre and redeveloping the surrounding land as part of a new Metropolitan Town Centre, and are evaluating the conceptual changes to the retail market and the role of town centres in the context of Brent Cross. H/abrDN would welcome the opportunity to take this work forward in collaboration with the Council.
- 1.5 H/abrDN submitted representations (Ref id058) to the LBB Draft Local Plan Regulation 19 (“Reg 19”) Consultation.
- 1.6 H/abrDN have reviewed the Schedule of Proposed Modifications to the Draft Local Plan (June 2022), LBB’s response to the Reg 19 Consultation representations and the relevant examination and evidence documents.
- 1.7 H/abrDN remain supportive of the Council’s general approach to development within the Brent Cross Growth Area. However, for the reasons expressed in response to the relevant questions, H/abrDN maintain their view that at present the Draft Local Plan is technically unsound and requires additional amendments as proposed.

2 Response to Questions

- 2.1 This Written Statement is submitted in response to the following Matter 4 Question:

Matter 4: Planning for the Borough’s economy, including employment, retail and other main town centre uses



Note continued

Issue 2:

Whether the Plan has been positively prepared and whether it is justified, effective, consistent with national policy and in general conformity with the London Plan in ensuring the vitality of the Borough's town centres and local/neighbourhood centres?

Questions:

1) Has the Plan approach been informed by adequate and proportionate evidence in relation to Barnet's town centres and local/neighbourhood centres? Responses should specifically address:

a) Whether the evidence reflects the level of population being planned for in the Borough?

b) Whether the evidence is relevant, up-to-date and takes appropriate account of market signals, when having regard to recent changes to the Use Classes Order?

c) If not, what is the Plan seeking to achieve relative to the requirements for and distribution of main town centre uses?

d) Whether the Plan is positively prepared, justified, effective and consistent with national policy with respect to the approach to the Borough's town centres and local/neighbourhood centres when having regard to responses to parts 1 a) to c) of this question and if not, how could soundness be achieved?

- 2.2 H/abrdn welcome the modification to Draft Policy TOW01 specifically referencing residential as an appropriate use within town centres.
- 2.3 However, as detailed in the Matter 2 Written Statement H/abrdn have significant concerns regarding the evidence that supports the inclusion of a specific level of new comparison floorspace to be delivered.
- 2.4 Draft Policy BSS01 identifies that in order to provide for the Council's vision for Barnet between 2021 and 2036, 56,600sqm of new retail space is to be delivered at Brent Cross North.
- 2.5 The key retail evidence is the Barnet Town Centres Floorspace Needs Assessment 2017 which is not reflective of the current retail market, including H/abrdn's own decision to delay delivery of the development north of the A406 approved as part of the 2014 Planning Permission for the wider Brent Cross Growth Area.
- 2.6 The Council are working as part of the West London Alliance on a new study to establish how much additional retail provision may be needed over the plan period. There is no date for the publication of this evidence. However, the level of comparison retail growth is likely to be less than previously forecast and accounted for in the Draft Local Plan.
- 2.7 H/abrdn do not consider that the Draft Local Plan is based on up-to-date evidence. The inclusion of a retail floorspace figure in Policy BSS01 based on a scale forecast prior to the changes to the retail sector is not considered to be 'justified' or appropriate.
- 2.8 As currently drafted, the policies are unsound and inconsistent with the provisions of the National Planning Policy Framework ("NPPF") (2021) at paragraph 31 and 35.



Note continued

- 2.9 The specific retail figure should be deleted from Draft Policy and replaced with wording which supports the creation of a vibrant and sustainable retail, leisure and mixed use Metropolitan Town Centre at Brent Cross North.