

Submission to NLWP Examination Hearing

1. The Plan identifies a shortfall in capacity during the plan period including, and as a direct consequence of, the predicted loss of BAR3. And yet it fails to allocate land to provide sufficient capacity including that to replace BAR3. The plan led system is intended to identify if there are predicted capacity gaps and where there is one, then allocate suitable sites where facilities to provide the additional capacity may be located. The failure of the NLWP to do this, renders the Plan as currently written, unsound.

2. The fact that the Authorities now suggest through proposed modifications to para 8.12 and Schedule 1, that a site to provide compensatory capacity for the release of BAR3 is to be identified in the forthcoming Barnet Local Plan shows an acceptance that the provision of compensatory capacity ought to be addressed through the development plan system (rather than in a piecemeal fashion through development management) as per the London Plan. However the suggested solution is not appropriate because:

1. The NLWP is the waste plan, so provision for waste facilities ought to be addressed through that mechanism. The failure of the NLWP to do so renders it unsound (point 1).
2. Why would a repeat of the process by LB Barnet identify any better sites than the four already identified in Barnet through the Plan site selection process, all of which could accommodate the capacity requirement?
3. Plus there is no requirement for compensatory capacity to be solely sought within the host borough area, in this case LB Barnet. The London Plan only seeks net self sufficiency across London and the emerging London Plan acknowledges that compensatory capacity may be provided anywhere in London.

Proposing reliance on Barnet's Local Plan, with no certainty of delivery, limits the prospect of identifying suitable land unreasonably, and risks frustrating delivery of the consented Brent XC regeneration scheme. The purpose of the Plan led system is to introduce a degree of certainty and direct development to appropriate locations, which by not addressing the issue the NLWP currently fails to do.

All we are actually asking is:

1. For BAR3 (along with the other three sites) affected by the redevelopment to be deleted from the plan and therefore released from the safeguarding obligation, in acknowledgement of their lack of availability going forward (why safeguard a site you know is going to be lost?); and
2. For compensatory capacity to be provided through the plan for BAR3 by allocating a site of less than a hectare to accommodate a facility offering equivalent capacity.