

Barnet Local Plan Examination in Public Transport for London Commercial Development Written Statement on: Matter 3: Meeting the Borough's Housing Needs

Issue 2: Affordable Housing

1) Policy HOU01 sets out the specific approach to affordable housing, in that regard:

a) *Is the policy sufficiently clear and in general conformity with the strategic target and approaches set out in Policies H4 and H5 of the London Plan?*

Policy HOU01 and the supporting text, as proposed by the Council to be modified (EXAM 4: Council's Proposed Modifications, MM117, Plan paragraph 5.4.10) does not conform to the approaches set out in Policies H4 and H5 of the London Plan. This is because, in referring to the 50% target for affordable housing provision on "publicly owned land", it does not make reference to portfolio agreements with the Mayor as set out in Policies H4 and H5 and paragraph 4.4.7 of the London Plan. As such the Plan as currently proposed is not clearly written and unambiguous.

Portfolio agreements between the Mayor and public landowners enable the latter to provide 50% affordable housing across a portfolio of sites provided at least 35% affordable housing is provided on each site, with the required affordable housing tenure split on the initial 35 per cent (London Plan, paragraph 4.4.7). TfL has such an agreement with the Mayor. This provides flexibility across our portfolio of sites, for eg. enabling lower levels of affordable housing provision on more challenging and less viable sites to be balanced by higher provision on less complex and more financially viable ones. The portfolio approach also enables public landowners with multiple housing sites to optimise returns and revenue from development which in TfL's case is directed back into the provision of public transport services. The portfolio approach is particularly important for TfL which often has high abnormal development costs associated with construction at and adjacent to critical transport infrastructure. We will often seek to improve transport interchange and customer experience at our housing development sites; in many cases we have to undertake complex and expensive removal / relocation of eg. power and signalling cables, power transformers and substations etc; and there are high engineering and construction costs associated with building at or adjacent to cuttings, embankments and trackside generally.

In order that Policy HOU01 and the supporting text in paragraph 5.4.10 is clearly written and unambiguous, reference to the portfolio agreement should be added. We address this in more detail, including suggested further modifications to paragraph 5.4.10 and Policy HOU01, in our letter sent to the Council on 18 August 2022 responding to EXAM 4: Council's Proposed Modifications (Enclosure 1). Such a reference to the portfolio agreement is made in draft Local Plan preceding paragraph 5.4.9 and in our view needs repeating in the subsequent paragraph and in Policy HOU01 to provide clarity.