Barnet Local Plan EIP – Note on Sites in Development Frameworks

Reason for producing this note

On Day 2 (Wednesday 21st September) at the hearing session's, consideration of Matter 2 – Spatial Strategy and Strategic Policies, Inspector Wildgoose requested provision of a note concerning sites that are included in a development framework (and already covered by SPD) that have not been allocated and why they are not included in the plan. This Note should:

- Draw together previous development frameworks, including consideration of issues bringing sites forward (for example, why some sites in SPDs have not been brought forward and proposed as site allocations);
- Consider sites in Growth Areas and Opportunity Areas; and,
- Explain the site selection process methodology applied to date in those regards.

Background

The Local Plan Schedule of Proposals comprises sites from planning frameworks (Area Action Plans (AAPs), Supplementary Planning Documents (SPDs) and Town Centre Strategies / Frameworks. The Housing Trajectory (EXAM 10) clearly sets out all sources of sites. This includes unimplemented sites from extant planning frameworks.

All sites identified in the planning frameworks listed above represent opportunities to intensify the use of brownfield land in accessible locations, including town centres. These planning frameworks have all previously gone through a formal approval process (in accordance with Council's governance) and public consultation.

Sites have been brought forward from a suite of planning frameworks ranging from Mill Hill East AAP in 2009 to the Edgware Growth Area SPD, adopted in June 2021. Therefore the sites have gone through a site selection process twice.

This Note sets out why some sites from these planning frameworks are in the Schedule of Proposals and why some sites are not. This includes consideration of all Growth Areas and New Southgate Opportunity Area. Clarification about terminology as regards Growth Areas and Opportunity Areas is provided by MM20, MM22 and MM23 within Proposed Modifications (EXAM 4).

Consideration

Site selection process of previously identified sites covers the initial identification of sites within planning frameworks and their subsequent carry forward to the Local Plan. All sites identified in previous planning frameworks are brownfield opportunities in accessible locations.

The Local Plan (para 1.3.3) highlights that unimplemented allocations in the Mill Hill East and Colindale AAPs remain part of the Local Plan.

Mill Hill East AAP (Core_Gen_10) Adopted 2009

The relevant strategic policy for Mill Hill East is **Policy GSS07**. Mill Hill East is not a Growth Area. The Plan identifies it as an area of good suburban growth with the opportunity to optimise the capacity of sites. The Strategic Sites Delivery Technical Paper (EXAM 9) sets the context for Mill Hill East.

As evidenced by the Strategic Sites Delivery Technical Paper and the Housing Trajectory (EXAM 10) development is progressing at Millbrook Park with completion expected by 2025. **There are no specific designations of sites within the AAP**. However it is considered that Mill Hill East Station (Proposal Site 47) and IBSA House (Proposal Site 46) are identified in terms of landownership (Figure 3.1 of the AAP) and an Illustrative Development Framework (Figure 5.10 of the AAP). The Illustrative Development Framework highlights that IBSA House is 'retained for future consideration' and Mill Hill East station is proposed as a mixed use scheme. The Council considers that there are merits in bringing forward land identified in the AAP that has not yet been develop. This land is represented by Site Proposals 46 (IBSA House) and 47(Mill Hill East Station).

Colindale AAP (Core_Gen_11) Adopted 2010 (Colindale Growth Area)

The relevant strategic policy for Colindale is **Policy GSS06**. Colindale is a Growth Area. The London Plan designates Colindale as an Opportunity Area. However it is the Council that sets the boundaries of the Opportunity Area. This has been done through the Colindale AAP. The boundaries of the Opportunity Area are coterminous with that of the Growth Area. The Strategic Sites Delivery Technical Paper (EXAM 9) sets the context for Colindale.

As evidenced by the Strategic Sites Delivery Technical Paper (EXAM 9) and the Housing Trajectory (EXAM 10) regeneration has seen significant progress in the Colindale Growth Area since 2010. This has included implementation of the sites identified in the AAP.

Since 2010 the following sites from the AAP remain unimplemented. These are listed in the Housing Trajectory. These consist of :

- Burger King and D&A AAP site 24 (0.4 ha)
- Kwik Fit AAP site 23 (0.1 ha)
- McDonalds AAP site 20 (0.5 ha)
- Merit House AAP site 25 (1ha)
- Middlesex University Student Accommodation AAP site 7 (2.2 ha)

The Local Plan has carried forward AAP Site 24 **Burger King and D&A** and AAP Site 20 **McDonalds** as Proposal Site 11 and Proposal Site 12. These are low density uses on a Major Thoroughfare which can be intensified to provide residential uses in an accessible location.

The Local Plan has not carried forward AAP Site 23 – **Kwik Fit** as this site continues to serve an important function in terms of car repairs and maintenance. However it remains a development opportunity as an unimplemented allocation in the Colindale AAP.

With regards to **Middlesex University Student Accommodation** (AAP Site 7) – the University still has long term ambitions for redevelopment at this site. The student accommodation (Platt Hall) comprises predominantly three-storey buildings along with a Grade II listed former Officers Mess building which formed part of RAF Hendon. However it remains a development opportunity as an unimplemented allocation in the Colindale AAP. The opportunity provided by the re-development of student housing at Platt Hall that is sympathetic to the context and character of the Grade II Listed Writtle House is reflected in the Local Plan at **Policy GSS06 – Colindale Growth Area** which highlights that redevelopment will provide an uplift in the number of student units on the site.

Merit House (AAP Site 25) was subject to extensive refurbishment in 2013, creating a landmark office building occupied by Utility Warehouse. Ambitions for residential conversion are unlikely to be realised whilst high quality office accommodation is utilised. However it remains a development opportunity as an unimplemented allocation in the Colindale AAP.

The following sites in the AAP that are currently under construction consist of :

- Imperial House AAP site 27 (0.4 ha) Development of 102 homes. Completion expected 2023.
- Grahame Park Estate AAP site 2 (35 ha) Delivering a total of 2,088 new homes this is the largest Estate Regeneration scheme in the Borough. Supported by the Grahame Park Estate SPD (EB_DH_10) adopted in 2016 and the subsequent planning consent 19/5493/OUT the regeneration it is not expected to fully complete until 2035.
- Beaufort Park **AAP site 8** (10 ha) Development of 2,800 homes, of which 2,300 completed. Full completion expected in 2024
- Peel Centre East AAP site 12 (21 ha) and Peel Centre West AAP site (3.8 ha) now (excluding Peel House where the Metropolitan Police relocated in 2016) largely known as Colindale Gardens. Development of 2,800 homes of which 1,110 completed. Full completion by 2026/27.

With development underway these sites have not been included within the Schedule of Proposals.

The site known as Station House – **AAP site 14** (0.15 ha) has been implemented with demolition of Station House above Colindale underground station. Further proposals for Colindale Station are reflected in the **Colindale Station** SPD (EB_E_20) adopted in 2019 and subsequent planning consent (19/0859/OUT). Although not a specific allocation within the Local Plan the station remains a key area for Colindale's growth and a focus for intensification by virtue of its high PTAL. Development at Colindale Underground Station is highlighted within Policy GSS06 – Colindale Growth Area which states that Land at Colindale Underground Station will be redeveloped to provide a new, higher capacity, step-free access station.

New Barnet Town Centre Framework (EB_E_13) Adopted 2010

The relevant strategic policy for New Barnet is **Policy GSS08 Barnet's District Town Centres.**

The 2010 Town Centre Framework identified 8 key opportunity sites around New Barnet to help transform the town centre. The Key Opportunity sites are :

Site 1 – the former East Barnet Gas Works and surrounding land;

- Site 2 the former Optex site and surrounding land;
- Site 3 New Barnet Sainsbury's;
- Site 4 Site at corner of East Barnet Road and Victoria Road;
- Site 5 Fayers Building Yard;
- Site 6 Approach Road;

Site 7 – Station Approach towers; and Site 8 – Station Road towers.

The Local Plan has carried forward as allocations the following sites (in full or in part) : Site 1 (Proposal Site 21- New Barnet Gasholder and Proposal Site 19 - East Barnet Shooting Club), Site 2 (Proposal Site 16 – 45 -69 East Barnet Road), Site 3 (Proposal Site 22-Sainsburys), Site 5 (Proposal Site 20 – Fayers Building Yard and Church and Site 8 (Proposal Site 52 – Kingmaker House).

Since 2010 there has been significant progress with sites identified by the Framework.:

Site 1 – the former East Barnet Gas Works and surrounding land – site of 5.35 ha of which Proposal Site 21 - New Barnet Gasholder (2.23 ha) and Proposal Site 19 - East Barnet Shooting Club (0.25 ha) is allocated in the Local Plan. The remaining land known as the Victoria Quarter is a consented scheme (B/04834/14) listed in the Housing Trajectory. Land is now awaiting development after the decommissioned gas works has been cleared and land remediated. The developer has therefore implemented the consent, however it has sought to increase density and add more residential units on the site. The Council refused the application and the developer appealed. The Council refers to the recent appeal decision on land formerly know as British Gas Works, Albert Road, New Barnet (EB_SDG_07). The appeal was dismissed in terms of impact on character, appearance and living conditions. Conflict with the NPPF and National Design Guide in terms of the schemes design was also cited as a reason to dismiss the appeal.

Site 2 – the former Optex site and surrounding land – this site of 1.02 ha has been subject to partial redevelopment. The Optex site was redeveloped for housing and the rest of the amounting to 0.6 ha been allocated in the Local Plan as Proposal Site 16 - 45 -69 East Barnet Road.

Site 3 – New Barnet Sainsbury's – this site of 1.03 ha is allocated in the Local Plan as Proposal Site 22 – Sainsburys

Site 4 – Site at corner of East Barnet Road and Victoria Road. This site has been redeveloped.

Site 5 – Fayers Building Yard- this site of 0.19 ha is allocated in the Local Plan as Proposal Site 20 – Fayer's Building Yard and Church.

Site 6 – Approach Road – this site of 0.07ha has been redeveloped.

Site 7 – Station Approach towers – the office blocks on this site of 0.24 ha on Station Road have been converted to residential; and

Site 8 – Station Road towers – this 0.51 ha site comprised 3 office blocks, 2 of which have been converted to residential. The other one Kingmaker House is allocated in the Local Plan as Proposal Site 52 - Kingmaker House.

Finchley Church End Town Centre Strategy (EB_E_14) Adopted 2012

The relevant strategic policy for Finchley Church End / Central is **Policy GSS08 Barnet's District Town Centres.**

The 2012 Strategy identified 8 key opportunity sites around Finchley Church End to help enhance the town centre. The Key Opportunity sites are :

Site 1: 401-405 Nether Street, Site 2: Winston House and 2-4 Dollis Park Site 3: Gateway House Site 4: 290-298 Nether Street Site 5: Finchley Central Station car park (and land to the east) Site 6: Station Road Site 7: Central House and 1-9 Ballards Lane Site 8: Tesco, Ballards Lane

The Local Plan has carried forward as allocations the following sites (in full or in part) : Site 4 and Site 5 (Proposal Site 30 – Finchley Central Station), Site 7 (Proposal Site 59 – Central House), Site 8 (Proposal Site 62 – Tesco Finchley),

Since 2012 there has been significant progress with sites identified by the Strategy :

Site 1: 401-405 Nether Street - this site of 0.1 ha has been redeveloped for housing;

Site 2: Winston House and 2-4 Dollis Park- this site of 0.6 ha has been converted / redeveloped for residential, commercial and hotel uses;

Site 3: Gateway House – this site of 0.2 ha has been redeveloped for residential and community uses;.

Site 4: 290-298 Nether Street - this site of 0.3 ha is now allocated in the Local Plan as part of Proposal Site 30 – Finchley Central Station,

Site 5: Finchley Central Station car park (and land to the east) – this site of 0.7 ha is now allocated in the Local Plan as part of Proposal Site 30 – Finchley Central Station,

Site 6: Station Road - this site of 0.4 ha is now allocated in the Local Plan as part of Proposal Site 30 – Finchley Central Station,

Site 7: Central House and 1-9 Ballards Lane – this site of 0.1 ha is now allocated in the Local Plan as part of Proposal Site 59 – Central House,

Site 8: Tesco, Ballards Lane - this site of 1.0 ha is now allocated in the Local Plan as part of Proposal Site 62 – Tesco Finchley.

The Spires Shopping Centre, Market Site and Territorial Army Centre Planning Framework (EB_E_15) Adopted 2012

The relevant strategic policy for Chipping Barnet is **Policy GSS08 Barnet's District Town Centres.**

The 2012 Framework identified 3 key sites around Chipping Barnet Town Centre :

- The Spires Shopping Centre
- Barnet Market
- Territorial Army Centre

Since 2012 the development ambitions for the Spires Shopping Centre and Barnet Market has changed reflecting several changes in ownership. The Local Plan has therefore only carried forward as an allocation the Territorial Army Centre (Proposal Site 43 – Army Reserve Depot).

The Spires Shopping Centre – ambitions expressed in the 2012 Planning Framework were largely to improve layout of the Centre and accessibility from the High Street as well as internal re-configuration to create larger retail units. The Council considered that these ambitions could be best realised through planning applications rather than through an allocation in the Local Plan. The retail market has changed since 2012 as has the ownership of the Spires (several times in the last decade). The Council expects the new owners BYM Capital to come forward with proposals that will enhance this key retail destination.

Barnet Market – ambitions expressed in 2012 were to improve the site in terms of surface and infrastructure as well as visibility of the Market on St Albans Road and connections with the Spires. Ownership of the site has changed several times in the last decade. In 2018 planning consent was given for a new Premier Inn on the Market site. This consent has now expired. The Council considered that ambitions for the Market site would be realised through this planning consent rather than through an allocation in the Local Plan. In 2017 the Market was moved to a new site on Stapylton Road, known as the Bandstand. The Market site is now in the same ownership as the Spires. The Council is therefore expecting the new owners to come forward with proposals that reflect ambitions in the Framework to reintegrate this site with the Spires.

Territorial Army Centre – ambitions for this site are now reflected in Proposal Site 43 – Army Reserve Depot.

Chipping Barnet Town Centre Strategy (EB_E_16) Adopted 2013

The relevant strategic policy for Chipping Barnet is **Policy GSS08 Barnet's District Town Centres.**

The 2013 Town Centre Strategy went beyond the 2012 Planning Framework in focusing on the wider issues facing Chipping Barnet town centre. Within 4 Character Areas the Strategy identifies opportunity sites within the town centre.

Cultural Quarter - Public realm improvements: corner of Meadway at QE Girls School; opposite corner and footpath to tube station.

Historic Heart - Improvements to the setting of Tudor Hall through removing or better masking the car park area to its front.

High Street - Barnet Market, The Spires

Hadley Edge - Territorial Army Centre

The Council refers to previous comments about the opportunity sites at Barnet Market, The Spires and Territorial Army Centre as set out within the section on The Spires Shopping Centre, Market Site and Territorial Army Centre Planning Framework.

North Finchley Town Centre Framework SPD (EB_E_19) Adopted 2018

The relevant strategic policy for North Finchley is **Policy GSS08 Barnet's District Town Centres.**

The SPD identifies Key Opportunity Sites within the town centre boundary.

Six Key Opportunity Sites (KOS) are identified with potential for comprehensive mixed use development, which will drive the town centre's regeneration.

KOS 1: Tally Ho Triangle & artsdepot KOS 2: Ballards Lane/Nether St KOS 3: Finchley House KOS 4: East Wing KOS 5: Friern Park/High Rd KOS 6: Lodge Lane

The Local Plan has carried forward as allocations all North Finchley SPD sites :

KOS 1: Tally Ho Triangle & artsdepot (Proposal site 61 – Tally Ho Triangle)
KOS 2: Ballards Lane/Nether St (Proposal site 57 – 309 -319 Ballards Lane)
KOS 3: Finchley House (Proposal site 60 – Finchley House)
KOS 4: East Wing (Proposal site 66 – East Wing)
KOS 5: Friern Park/High Rd (Proposal site 64 – 744 -776 High Road)
KOS 6: Lodge Lane (Proposal site 58 – 811 High Road & Lodge Lane car park)

Edgware Growth Area SPD (EB_E_21) Adopted 2021

The relevant strategic policy for Edgware is Policy GSS05 - Edgware Growth Area

The SPD supports comprehensive regeneration of key sites that will support the town centre and deliver much needed new homes to a well-connected location. The SPD has been produced in partnership with LB Harrow.

Key sites identified in LB Barnet are :

- **Broadwalk Centre and the Station** This area encompasses the Broadwalk Shopping Centre and associated car parking, Edgware Underground Station, platforms and tracks, and Edgware Bus Station, along with bus standing and garage.
- **Forumside** This location includes land to the rear of the Grade II listed Railway Hotel and comprises businesses, car parking, residential and brownfield land under several different ownerships.

The Local Plan has carried forward as allocations all Edgware Growth Area SPD sites :

Broadwalk Centre and the Station - This site forms part of Proposal site 27 - Edgware Town Centre and Proposal site 28 – Edgware underground and bus stations.

Forumside – This site forms part of Proposal site 27 - Edgware Town Centre

In 2013 the Council adopted the Edgware Town Centre Framework (EB_E_17) as a mechanism for revitalising Edgware's retail elements, in particular the Broadwalk Centre, and public realm. The Town Centre Framework which identified 3 key sites a) The Broadwalk Shopping Centre; b) The Forumside sites; and c) Land around Premier House and along Station Road has not helped to progress the health of Edgware, having been produced before the ongoing changes to town centres across Barnet and London-wide, in particular the decline of major retail stores, and the increased pressure for new homes. Sites identified in the 2013 Framework were carried forward through the Growth Area SPD and as

allocations in the Local Plan Proposal 27 – Edgware Town Centre and Proposal 28 - Edgware underground and bus stations.

Site Selection Methodology to Date

- Sites were assessed on their suitability in principle for promoting the strategic aims and objectives of the 2012 Local Plan, NPPF and London Plan
- physical or environmental factors, such as flood risk or locations within conservation areas, were acknowledged as potentially further restraining development capacity.
- Information on the suitability, availability, achievability and constraints was used to assess the timescale within which each site is capable of development.
- Ability to deliver sites with support of existing infrastructure.
- Sites in SPDs and AAPs were subject to assessment through supporting Sustainability Appraisals
- Sites carried forward as Proposals in the Local Plan have been subject to assessment through the Integrated Impact Assessment (Core_Gen_02).

Conclusion

As evidenced in this Note the Council has sought to bring forward as Local Plan allocations those unimplemented sites that have been identified in previous planning frameworks and have been subject to public consultation.

This Note has explained why some sites identified in previous frameworks have not been brought forward and proposed as site allocations.

This Note has considered sites in Growth Areas at Colindale and Edgware where previously adopted planning frameworks are in place. The majority of frameworks are focused on Town Centres.

The site selection process methodology that has been applied to the identification of sites has been explained.