

# **London Borough of Barnet**

## **Draft Local Plan (Reg 18)**

### **Site Selection Background Report**

**December 2019**

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## **1.0 Purpose of the Report**

- 1.1 The Council is currently preparing a new Local Plan which once adopted will cover the period from 2021 to 2036. The new Local Plan must allocate sufficient land in appropriate locations to meet housing and other land use requirements over the Plan period.
- 1.2 The purpose of this Site Selection Background Document is to set out the approach that has guided the preparation of an evidence base to support the proposed site proposals. It explains the methodology used for selecting appropriate sites to meet identified housing and other development needs, including for employment, community and leisure.
- 1.3 The Local Plan quantifies the projected level of growth and identifies the supply of sites needed to meet this growth. The process of preparing Barnet's emerging Local Plan requires the inclusion of a Schedule of Sites: in the Regulation 18 Preferred Approach Draft Local Plan document, this Schedule is set out in Annex 1.

## **2.0 Planning Framework and Guidance**

- 2.1 National Planning Policy Framework (NPPF) establishes the requirement that strategic policies in local plans should:

*set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for ... housing (including affordable housing), employment, retail, leisure and other commercial development (paragraph 20).*
- 2.2 Paragraph 23 of the NPPF goes on to add that plans should address objectively assessed needs over the plan period and that:

*This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.*
- 2.3 Specifically, in relation to the identification of land for new homes, paragraph 67 sets out that:

*Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment ... Planning policies should identify a supply of:*

  - a) *specific, deliverable sites for years one to five of the plan period; and*
  - b) *specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.*
- 2.4 Developable sites are defined by the NPPF as those which are:

*in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.*
- 2.5 The National Planning Practice Guidance (NPPG) on *Housing and economic land availability assessment* states that:

*The assessment is an important source of evidence to inform plan-making and decision-taking.*

- 2.6 The Guidance goes on to say that:

*the assessment does not in itself determine whether a site should be allocated for development. It is the role of the assessment to provide information on the range of sites which are available to meet the local authority's requirements, but it is for the development plan itself to determine which of those sites are the most suitable to meet those requirements.*

- 2.7 To guide the process of identifying suitable sites the NPPG provides a methodology flowchart (see Appendix 1).
- 2.8 The NPPF (para 73) also requires that LPAs should identify and update annually a supply of specific deliverable sites and that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period. In addition, consideration should be given to the appropriateness of setting out the anticipated rate of development for specific sites.
- 2.9 To meet the needs of the NPPF and NPPG, the Council has taken an approach that identifies appropriate, developable sites for inclusion in the Draft Local Plan that will allow the Plan to provide for identified requirements.

### **3.0 Barnet's Local Plan**

#### **3.1 Overview**

- 3.1.1 The Council has started work on a new Local Plan. The existing Local Plan Core Strategy and Development Management Policies Development Plan Document were adopted in 2012. Policies in Local Plans should be reviewed at least once every five years to check whether they need to be updated on the basis of changing circumstances locally or relevant changes in national policy. Therefore, these documents now need to be reviewed in full and the Local Plan updated to ensure that the Borough continues to grow and develop to provide a thriving place for people to live, work and visit. The new Local Plan establishes the Council's vision for growth and development in Barnet over a 15-year period (2021-2036).
- 3.1.2 Many of the technical evidence base documents listed at appendix A in the Reg 18 Draft Local Plan have informed the sites' requirement and availability for the Local Plan.

#### **3.2 Strategic Housing Market Assessment**

- 3.2.1 In 2018 the Council, in partnership with the West London Alliance, commissioned a Strategic Housing Market Assessment (SHMA) consisting of two reports - a Borough SHMA for Barnet and a sub-regional SHMA for West London which establishes the level of housing demand and the scale of housing supply necessary to meet this demand – including backlog demand from households in temporary accommodation, and those on waiting lists with an identified housing need. Barnet's SHMA identifies

the Full Objectively Assessed Need (OAN) for housing in Barnet as 3,060 dwellings per year. This equates to 46,000 new homes over the lifetime of the Local Plan.

- 3.2.2 Barnet therefore proposes to deliver a minimum of 46,000 new homes over the 15-year Plan period up until 2036.

### **3.3 Strategic Housing Land Availability Assessment**

- 3.3.1 The Strategic Housing Land Availability Assessment (SHLAA) is a technical exercise to determine the quantity and suitability of land potentially available for housing development. An assessment is a required as part of the evidence base needed for the preparation of a Local Plan, as specified in the NPPF paragraph 67.
- 3.3.2 However, it is important to note that the assessment is not a site allocation exercise and does not in itself determine whether a site should be developed. Therefore, the inclusion of a site in the SHLAA does not mean that it will necessarily be allocated or successfully obtain permission to be developed for housing. Conversely, the non-inclusion of a site in the SHLAA does not necessarily prevent future residential development as planning applications received will need to be considered on their individual merits, having regard to relevant development plan policies and other material considerations.
- 3.3.3 The Council undertook its SHLAA as part of the GLA's London-wide SHLAA to inform the London Plan. The London SHLAA included an assessment of larger sites (defined as being of 0.25 hectares and more in size) which were identified from a range of sources, including:
- Sites included in previous SHLAAs.
  - Sites allocated for development in development plans.
  - Sites with planning permission.
  - Sites identified by land owners and other interested parties through a 'call for sites' exercise.
  - Sites identified through development capacity studies undertaken by the GLA.
- 3.3.4 Sites included in the SHLAA were assessed by LB Barnet and the GLA in order to establish the capacity, availability, deliverability and their suitability for residential development. This took into account the range of planning policy, environmental and delivery constraints and the extent to which these can be mitigated or addressed during the London Plan period to 2041. The 2017 SHLAA forms part of the evidence base for the emerging replacement London Plan.

#### **Site Size**

- 3.3.5 Where there is a shortage of land available for meeting identified housing needs, the NPPF (Paragraph 123) states that it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. Therefore, plans are expected to contain policies that optimise the use of land and meet as much of the identified need for housing as possible. The use of minimum density standards is advocated for city

and town centres and other locations that are well served by public transport with an expectation of achieving a significant uplift in the average density of residential development unless there are strong reasons why this would be inappropriate.

- 3.3.6 Whilst the London SHLAA did not consider sites below 0.25ha, it was considered that for the purposes of identifying potential sites for inclusion in Barnet's Local Plan a lower site size threshold should be used to better reflect the types and numbers of sites across particularly the town centres and other more urban parts of the Borough well served by public transport. Therefore, excepting the inclusion of three smaller Council owned car parks, a minimum site size of 0.1ha has been used. Applying the 2.7 – 3 habitable rooms per unit figures given in the London Plan density matrix table (see Appendix 4) the minimum density is 50 units per hectare in the areas least well served by public transport. Therefore, using a minimum site size threshold of 0.1ha will identify sites capable of potentially delivering a minimum of 5 units in accordance with the numerical threshold suggested in the PPG.
- 3.3.7 Accordingly, only sites that meet or surpass this threshold have been assessed; smaller sites, excepting the three Council owned car parks, have been sifted out and excluded from detailed analysis. An exception in respect of the minimum site size threshold has been made for the car parks on the basis that each of the sites is expected to yield more than 5 units and, being in Council ownership with no buildings needing to be demolished, all the sites are considered to be readily developable.

### **3.4 Traveller site requirements**

- 3.4.1 As part of the West London Alliance<sup>1</sup>, Barnet prepared the West London Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) (2018). This document provides a robust and objective assessment of current and future need for the provision of sites for travellers for the London Plan period 2016-2041, with a split to 2033 as required by the Planning Policy for Traveller Sites (PPTS).
- 3.4.2 The consultancy ORS study carried out a desk-based review of the data, including: Census data; site records; Traveller Caravan Count data; records of unauthorised sites/ encampments; information on planning applications/appeals; information on local enforcement actions; existing needs assessments and other relevant local studies; and existing national and local policy. Stakeholder engagement involved interviews with officers from the commissioning authorities and a survey of Travelling communities.
- 3.4.3 The GTAA identified no current or anticipated future need over the London Plan period to 2041 in Barnet for pitches and plots for Gypsy and Traveller households or Travelling Showpeople.

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<sup>1</sup> The West London Alliance comprises a partnership between the seven West London boroughs of Barnet, Brent, Ealing, Hammersmith & Fulham, Harrow, Hillingdon and Hounslow

### **3.5 Employment site requirements**

- 3.5.1 The Barnet Employment Land Review (BELR) considered the Borough's supply of office and industrial space as well as the prospects for the office market and jobs growth. The ELR concluded that efforts should be focused on protecting employment land.
- 3.5.2 The Council protects employment locations classified as Locally Significant Industrial Sites. It has implemented an Article 4 Direction to protect existing office accommodation (B1a) and industrial processes (B1c) from permitted development conversion to residential.
- 3.5.3 Within the Brent Cross Growth Area permission has been granted for 400,000 m<sup>2</sup> of Class B1a. In addition to Brent Cross the Council will seek to deliver 67,000 m<sup>2</sup> of new office space within Barnet's town centres as these are the most sustainable locations.

### **3.6 Waste plan requirements**

- 3.6.1 The Council needs to identify sufficient land to provide capacity to manage its waste target set out in the London Plan, and has joined with six other north London boroughs to produce the North London Waste Plan (NLWP) which once adopted will form part of Barnet's Local Plan. It will sit alongside the North London Joint Waste Strategy to secure the sustainable management of waste.
- 3.6.2 Within Barnet a site has been identified at Scratchwood Quarry to provide additional waste capacity. This is an existing waste management facility with potential to increase the volume of waste processed through more efficient and intensive use of the site.

### **3.7 Retail site requirements**

- 3.7.1 Brent Cross has outline consent from 2010 for up to 55,000m<sup>2</sup> of comparison retail floorspace. The Town Centre Floorspace Needs Assessment (TCFNA) considered demand for another 77,000 m<sup>2</sup> of comparison floorspace up to 2036 together with up to 33,330 m<sup>2</sup> of Class A3 to A5 (food and drink uses). As the retail market experiences significant and conceptual change there is a need for town centres to diversify in terms of other retail uses such as food and drink, becoming social and community hubs as well as economic centres supported by new housing development.

## **4.0 Site Sources**

### **4.1 Call for Sites**

- 4.1.1 NPPG emphasises the importance of issuing a call for sites so as to be transparent and identify as many potential opportunities as possible. The Guidance states that a

call for sites will need to set out the information sought from respondents, which could include:

- Site location;
- Suggested potential type of development;
- The scale of development; and
- Constraints to development.

- 4.1.2 Barnet provided a call for sites submission form to comply with the Guidance and sought nominations from land owners and developers seeking to realise development potential. These included public-sector partners such as Transport for London, Middlesex University, the NHS, Ministry of Defence, as well as the Council itself.
- 4.1.3 Barnet has carried out a ‘call for sites’ exercise on four occasions since the previous Site Proposals development planning document which was included as part of Barnet’s Unitary Development Plan (UDP) adopted in 2006. The timeline on Barnet’s call for sites and the number of sites submitted is as follows:

- 2009 - 42 sites submitted
- 2010 - 8 sites submitted
- 2015 - 37 sites submitted
- 2017 - 42 sites submitted

## 4.2 Other Sources for Sites

- 4.2.1 In addition to the Call for Sites submissions, sites were drawn from a range of other sources:
- Carried forward from Barnet’s previous site proposals document, the 2006 UDP.
  - Estate regeneration schemes. Estate renewal and infill sites are identified which involve the renewal and infill development of existing housing estates.
  - Allocated in other planning documents adopted by the Council – see details below.
  - Growth Areas identified in previous plan documents – see details below.

### Growth Areas identified in previous plan documents

- 4.2.2 The Local Plan for Barnet includes existing opportunity area planning frameworks for Brent Cross-Cricklewood and Colindale, along with a new opportunity area at New Southgate. These are identified in the London Plan.
- 4.2.3 Brent Cross Cricklewood – The London Plan identifies Brent Cross Cricklewood as an Opportunity Area. The planning framework for Brent Cross Cricklewood is set out in the Area Development Framework adopted as Supplementary Planning Guidance

in December 2005. Formerly a Regeneration Area Brent Cross / Cricklewood is now identified as three individual Growth Areas in Local Plan: Brent Cross, Brent Cross West / Staples Corner and Cricklewood Town Centre.

- 4.2.4 Colindale-Burnt Oak – The London Plan identifies Colindale as an Opportunity Area. The planning framework for Colindale is set out in the Area Action Plan adopted in March 2010. Unimplemented proposals in the AAP remain part of the Local Plan Schedule of Proposals. Formerly a Regeneration Area, Colindale is now identified as a Growth Area in the Local Plan.
- 4.2.5 New Southgate – The draft London Plan identifies New Southgate as an Opportunity Area. A planning framework will be produced jointly with the GLA, LB Enfield and LB Haringey. This will assess the development capacity of this area in the light of Crossrail 2.
- 4.2.6 Mill Hill East – The planning framework for Mill Hill East is set out in the Area Action Plan adopted in January 2009. Unimplemented proposals in the AAP remain part of the Local Plan. Formerly an Area for Intensification, Mill Hill East is now identified as a Growth Area in the Local Plan.
- 4.2.7 Local Area Frameworks – The frameworks provide the basis for managing and promoting positive change in identified town centres. Unimplemented key opportunity sites identified in these documents are a source for the Local Plan Schedule of Proposals, in particular the North Finchley Town Centre Framework SPD (2018) and New Barnet Town Centre Framework (2010).

## **5.0 Site Selection Methodology**

- 5.1 The Planning Practice Guidance (PPG)<sup>2</sup> provides advice on the approach to take to produce a Land Availability Assessment. An assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and other development uses over the plan period. The assessment should identify all sites and broad locations, (regardless of the amount of development needed), in order to provide a complete audit of available land. However, the assessment process provides the information needed to enable identification of sites that are most suitable for the level of development required<sup>3</sup>. The assessment therefore is an important source of evidence used to inform plan-making and decision-taking, as well as the identification of a five-year supply of housing land.
- 5.2 The key stages that the Council has had regard to are set out in the diagram taken from the PPG<sup>4</sup> and included at Appendix 1. Once sites were received and collated, this multi-stage sequential process was followed to assess and select sites to be allocated in the emerging Local Plan.

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<sup>2</sup> PPG Paragraph 001 Reference ID:3-001-20190722

<sup>3</sup> PPG Paragraph 008 Reference ID: 3-008-20190722

<sup>4</sup> PPG Paragraph 005 Reference ID:3-005-20190722

### **5.3 Stage 1: Site Identification and Surveys**

- 5.3.1 An initial filtering process was carried out to remove those sites for which there was no realistic prospect of the site coming forward for development during the Plan period. This site survey process was undertaken having regard to the PPG advice.<sup>5</sup>
- 5.3.2 It was predominantly a desk-based exercise using OS base maps, aerial and street photography supplemented by local knowledge and where necessary subsequent site visits. The following information was checked and recorded:
- site size, boundaries, and location;
  - current land use and character;
  - land uses and character of surrounding area;
  - physical constraints (e.g. access, contamination, steep slopes, flood risk, natural features of significance, location of infrastructure/utilities);
  - potential environmental constraints;
  - proximity to services and other infrastructure, such as public transport; and
  - where relevant, development progress (e.g. ground works completed, number of units started, number of units completed).
- 5.3.3 Then, having regard to existing and emerging development plan policies, an initial assessment was made of whether the site is suitable for a particular type of use or as part of a mixed-use development.
- 5.3.4 As recognised in the PPG<sup>6</sup> initial surveys need to be proportionate. There are likely to be sites which, when taking into account national policy and designations, it will not be appropriate to carry out these more detailed assessments as it is clear that they will not be suitable for development. Sites with certain planning policy designations are considered to be incompatible with the designation of potential development sites; in Barnet these are primarily:
- Green Belt; and
  - Metropolitan Open Land (MOL).
- 5.3.5 The Council strongly supports protection of Green Belt and MOL designated land through Draft Local Plan Policy ECC05. Barnet's Green Belt and Metropolitan Open Land Study (2018) shows that the majority of Barnet's Green Belt performs well and that all existing areas meet one or more of the purposes of Green Belt set out in the NPPF. The vast majority of the MOL is considered to be open and maintaining and protecting the functions, green links and other features it contains. Minor adjustments have been made to Green Belt and MOL boundaries where inconsistencies and errors have been identified, with the majority of these relating to errors in mapping.
- 5.3.6 This approach is consistent with the PPG advice<sup>7</sup> that in considering constraints when assessing the suitability, availability and achievability of sites the areas listed in footnote 6 of the NPPF (which includes Green Belt) provide strong reasons for restricting the scale, type and distribution of development in the plan area.

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<sup>5</sup> PPG Paragraph: 015 Reference ID: 3-015-20190722

<sup>6</sup> PPG Paragraph: 014 Reference ID: 3-014-20190722

<sup>7</sup> PPG Paragraph: 002 Reference ID: 3-002-20190722

Additionally, the PPG advises that sites with detailed permission should be considered achievable within the next 5 years, unless evidence indicates otherwise.

- 5.3.7 The initial sites filtering process was therefore carried out to remove those sites located in these designated areas listed above as well as those with extant permissions.

#### 5.4 Stage 2: Site Assessments

- 5.4.1 The purpose of the more detailed assessments at this stage is to establish whether the identified sites are deliverable, developable or not currently developable as defined in the glossary of the NPPF. In summary, to be considered deliverable sites for housing should be immediately available in a suitable location for development and achievable with a realistic prospect that housing will be delivered on the site within five years. To be considered developable a site should be in a suitable location for housing development with a reasonable prospect that the site will be available and viable to be developed at a particular stated future point in time.

##### *Suitability*

- 5.4.2 A site can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated<sup>8</sup>. When considering constraints, consideration should be given to the information collected as part of the initial site survey, as well as other relevant information, such as:
- national policy;
  - appropriateness and likely market attractiveness for the type of development proposed;
  - contribution to regeneration priority areas; and
  - potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation.
- 5.4.3 Individual assessments were made of the suitability of identified sites for different forms of development taking into account the range of needs for housing, economic and other uses.
- 5.4.4 In assessing sites against the adopted development plan, regard was had to how up to date, and therefore relevant, the plan policies are considered to be together with the emerging plan policies in the Reg 18 draft. The significance of any identified constraints on sites, and the extent to which constraints might be overcome, was also considered.
- 5.4.5 Whilst sites in existing development plans or with planning permission can generally be considered suitable for development, as the PPG notes, it is prudent to assess whether circumstances have changed which would alter their suitability. This is particularly relevant in Barnet's case given the age of the previous site proposals contained in the UDP adopted in 2006 and the need for up to date assessments of suitability to be reached informed by a range of factors including the suitability of the

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<sup>8</sup> Paragraph: 018 Reference ID: 3-018-20190722

land for different uses and by market signals useful in identifying the most appropriate use.

- 5.4.6 Sites that were considered to be potentially suitable for development were carried forward to the next stage of the assessment where the availability and achievability of each site was considered. Sites not considered suitable for development have been summarised in a table included within the appendices of this document.

#### *Availability*

- 5.4.7 The PPG<sup>9</sup> states that a site can be considered available for development, when, on the best information available, (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development, or landowner who has expressed an intention to develop, may be considered available.
- 5.4.8 Sites meeting the definition of deliverable should be considered available unless evidence indicates otherwise. Sites without permission can still be considered available within the first five years. If a site has been directly nominated by the land owner and/or developer in control of the site, in the absence of any information to suggest otherwise, it has been assumed that the site is available for development. However, it is noted that the PPG advises consideration can also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions.
- 5.4.9 Therefore, in reaching conclusions about the availability of a site, the following factors have been considered:

- Information submitted during the various call for sites exercises;
- Information provided by officers working within the Council's planning, regeneration, highways and estates teams;
- Whether the site is in active use;
- Whether the site has been cleared ready for redevelopment;
- Whether the site has any known ownership and tenancy issues;
- Whether the site can be developed now; and
- The delivery record of developers / landowners promoting sites.

#### *Achievability*

- 5.4.10 The PPG<sup>10</sup> advises that a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This involves making a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.
- 5.4.11 A full economic viability assessment of the plan, which will include the schedule of sites, will be undertaken before the plan is submitted for examination. However, at

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<sup>9</sup> Paragraph: 019 Reference ID: 3-019-20190722

<sup>10</sup> PPG Paragraph: 020 Reference ID: 3-020-20190722

this stage judgements reached regarding the achievability of the sites selected are based on more general considerations and information obtained including:

- Whether there is active developer interest in the site;
- Whether similar sites in Barnet or neighbouring authorities have been successfully developed in recent years;
- Whether there are any known abnormal development costs; and
- Current market conditions in Barnet and the wider north and west London sub-regions.

5.4.12 These conclusions will be reviewed when preparing the Regulation 19 Draft Local Plan. They will be informed by the consultation responses received to the Reg 18 draft together with the conclusions and recommendations reached by a full Local Plan economic viability study to be undertaken prior to publication of the Reg 19 draft Local Plan.

#### *Constraint resolution*

5.4.13 The PPG<sup>11</sup> advises that where constraints have been identified, the assessment will need to consider what action could be taken to overcome them. Examples of constraints include policies in the NPPF and the adopted or emerging development plan, which may affect the suitability of the site, and unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners, which may affect the availability of the site.

5.4.14 Therefore, the filtering process also removed sites for more specific reasons, such as the stipulations of previous planning conditions at a site, or the coverage of the site by a Site of Importance for Nature Conservation (SINC).

5.4.15 Sites removed from consideration as a result of this site selection process are shown in Appendix 3.

5.4.16 For sites where physical or environmental factors were identified, such as flood risk or conservation areas, these were not treated as reasons in themselves to remove a site as there might be possible ways to mitigate risks or impacts. While the environmental factors potentially restrain development capacity, these constraints are not necessarily absolute. Consequently, any environmental considerations have been referenced as limiting factors in the Schedule of Sites proformas.

5.4.17 The Schedule of Sites was prepared to include sites with the potential to come forward for development during the plan period up until 2036. Sites which already have planning permission, and therefore included in the Housing Trajectory, have been excluded from the Schedule of Sites. Sites with an extant permission can be viewed in the Authorities Monitoring Report (AMR) prepared annually.

#### **5.5 Stage 3: Windfall Assessment-**

5.5.1 The NPPF (para 70) and NPPG make clear that the inclusion of a windfall allowance may be justified in the anticipated supply where there is compelling evidence that this

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<sup>11</sup> PPG Paragraph: 021 Reference ID: 3-021-20190722

is a reliable source of supply. Small sites (less than 0.25 ha) have been included in the Local Plan on the basis of past completions being used as a guide to project expected future delivery. There is no detailed guidance on how a windfall allowance should be made and it is therefore a matter for individual LPAs to determine how to calculate this allowance. Given the age of Barnet's adopted Local Plan and 2006 UDP proposals map, (site proposals were not included as part of the 2012 adopted development plan documents), most of the sites delivered in recent years have not benefitted from a formal allocation in an adopted plan. However, this is not very helpful when trying to ascertain the quantum of units in the past that have been developed in a genuinely unplanned and unexpected way.

- 5.5.2 There are unlikely to be many windfall sites of 0.25ha and above during the first 5 years of the plan up until 2026 because it is anticipated that such sites would have been identified through either the London SHLAA process and the Council's most recent 2017 call for sites exercise. However, with regards sites below 0.25ha the figure used is based on the previous trend of small site delivery. This is in line with the Inspector's Panel Report on the draft new London Plan which rejected the policy-led approach to small sites, noting that Paragraph 48 of the NPPF establishes that compelling evidence is required in order to allow for windfall sites in the five-year supply. In his Response to the panel recommendations the Mayor London has accepted the Panel report findings on small sites.

## 5.6 Stage 4: Assessment Review

- 5.6.1 The purpose of this stage is to consider the development potential of all the sites selected and produce an indicative trajectory setting out how much housing and the amount of other development that can be provided, and at what point in the future over the period covered by the Local Plan (i.e. within years 1 to 5, 6 to 10, and 11 and beyond).
- 5.6.2 Following Reg 18 consultation and having revised the plan in the light of responses received an economic viability assessment of the whole plan, including the proposed sites, will be undertaken. An overall risk assessment will then be made at the Regulation 19 publication stage as to whether sites will come forward as anticipated.
- 5.6.3 The PPG<sup>12</sup> advises that if there is insufficient land at this stage it will be necessary to investigate how this shortfall can best be planned for. If there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, it will be important to establish how needs might be met in adjoining areas through the process of preparing statements of common ground, and in accordance with the duty to cooperate. The Council has already instigated these discussions by writing to neighbouring London boroughs and all Hertfordshire authorities asking whether any of these authorities are likely to be able to assist Barnet in meeting its objectively assessed housing need figure. Prior to publishing the Regulation 19 Draft Plan the Council will, having taken account of the responses received to this letter, progressed as necessary consideration of these matters through the production of a Statement of Common Ground. If, following this, objectively assessed needs cannot be fully met then the Council will be required to demonstrate the reasons why as part of the Local Plan examination process.

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<sup>12</sup> Paragraph: 025 Reference ID: 3-025-20190722

5.6.4 Following the process of filtering, 67 sites were selected for inclusion within the Regulation 18 Draft Local Plan Schedule of Sites.

## 5.7 Stage 5: Evidence Base

5.7.1 Following the assessment review and the process of filtering, information on the sites assessed has been assembled. This resulted in 67 sites being selected for inclusion within the Reg 18 Draft Local Plan Schedule of Sites. As explained below in the appendices of this document, and further detailed in the Reg 18 Draft Local Plan Schedule of Site Proposals, the following information has been provided for each of the sites included:

- **A list of all the sites considered** – numbered and cross referenced to locations shown on the policies map.
- **An assessment of each site** - in terms of suitability for development, availability and achievability to determine when the site might realistically be expected to be developed.
- **Details of each site** – in addition to those sites (listed at Appendix 2) included in the Schedule of Site Proposals, details of sites not selected for inclusion (see Appendix 3) are provided giving evidence and justification to explain why they have been discounted.
- **Details of the potential type, mix and quantum of development** – provided for each of the sites selected including an indicative trajectory of anticipated development expressed in 5 yearly tranches over the 15-year plan period (i.e. 1-5 years, 6-10 years and 11-15 years).

## 6 Schedule of Sites

### 6.3 Indicative Residential Capacity of Sites

6.3.1 Site capacity has been assessed having regard to policy in the NPPF on seeking the most efficient use of land, the site size and the public transport accessibility level (PTAL), which is used to determine the range of appropriate dwelling densities for residential development, and thus an indicative number of dwellings.

6.3.2 The sustainable residential quality (SRQ) density matrix from the London Plan (2016) (see Appendix 4) was used to provide a standard means of calculating indicative residential capacity. Each selected site was categorisation as either Central/ Urban/ Suburban, according to its location and context within the surrounding environment - building heights are reflected within the density levels. This information was then combined with the PTAL and the site area. Calculations of indicative capacity were then made for each site based on 2.7 to 3.0 habitable rooms per unit.

6.3.3 An assessment was carried out on the requirement and suitability for non-residential uses, such as community facilities, offices, industrial, or car parks. In many cases this means retention of existing uses. The non-housing element of a site is stated as percentage of the overall development and can be viewed in the table of deliverable and developable sites in Appendix 2.

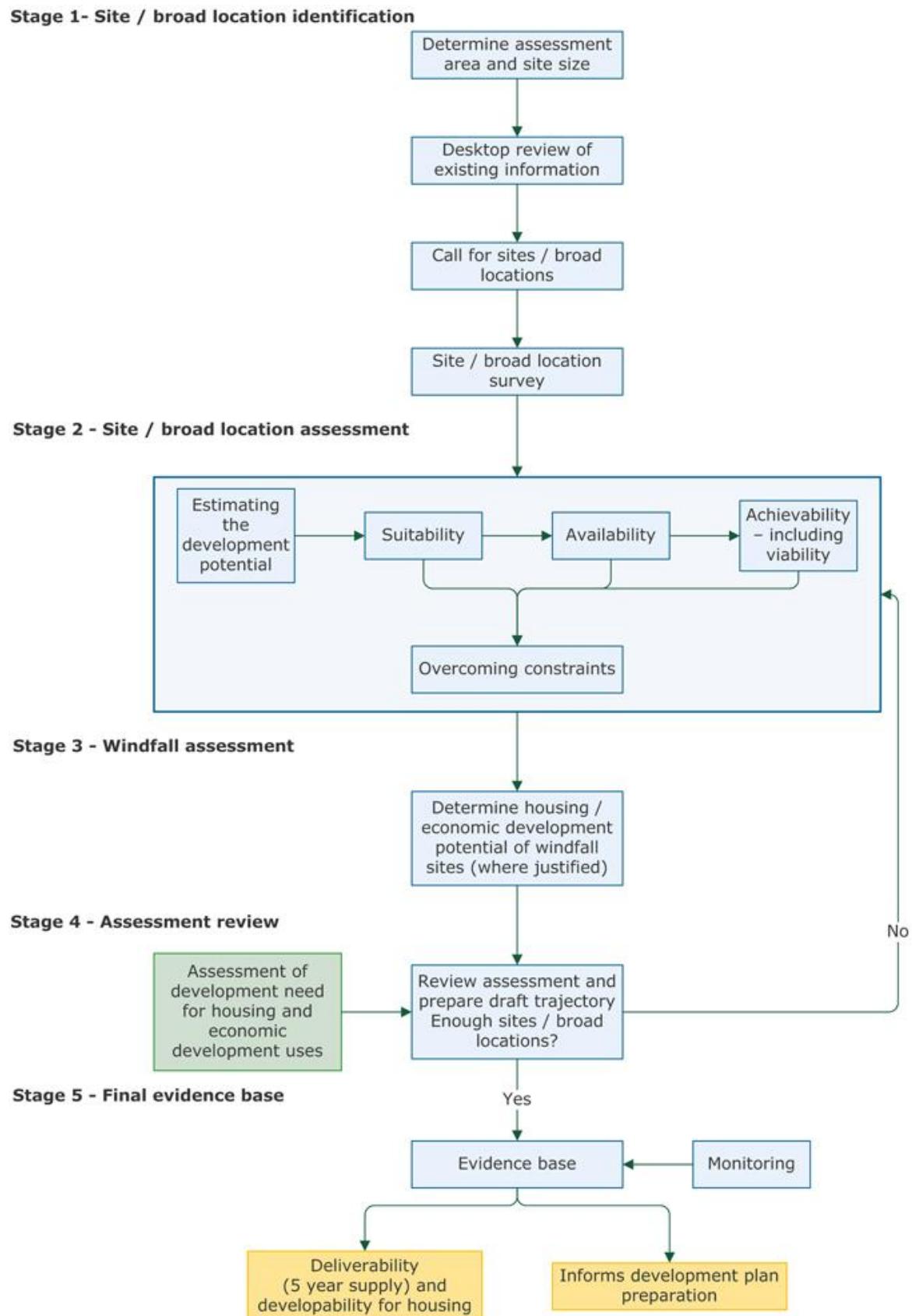
6.3.4 All of these assessed factors were then combined to calculate an indicative site capacity. In assessing the suitability, availability and achievability of individual sites an initial consideration has also been reached in terms of economic viability, informing the judgement reached as to whether a site can be considered deliverable within the first five years covered by the plan, or developable over a longer period

#### **6.4 Schedule of Sites Proforma**

6.4.1 Sites taken forward in the Regulation 18 Local Plan are presented in Annex 1 of the draft plan with individual site proformas that summarise key information, providing a site description and summary of key planning factors. Each proforma includes:

- Location and site plans
- Site area
- Ward
- PTAL – current and future
- Ownership
- Relevant Local Plan policies
- Existing uses
- Potential residential capacity
- Potential future uses
- Site description
- Planning considerations.

## Appendix 1 - NPPG Methodology Flowchart<sup>13</sup>



<sup>13</sup> NPPG - para 005 Ref ID:3-005-20190722

## **Appendix 2 – List of sites assessed as deliverable and developable**

<b>Site No.</b>	<b>Site</b>	<b>Ward</b>	<b>Address</b>	<b>Indicative Units</b>	<b>Non-residential Uses</b>
<b>1</b>	Church Farm Leisure Centre	Brunswick Park	Burlington Rise, Brunswick Park, EN4 8XE	12	-
<b>2</b>	North London Business Park (Major Transport Infrastructure)	Brunswick Park	Brunswick Park Rd, Brunswick Park, N11 1NP	1,000	A school, multi-use sports pitch, employment and associated car parking.
<b>3</b>	Osidge Lane Community Halls	Brunswick Park	Osidge Lane, Southgate, N14 5DU	16	75% community uses, school access and retained parking
<b>4</b>	Osidge Library & Health Centre	Brunswick Park	Brunswick Park Rd & Osidge Lane, Brunswick Park, N11 1EY	16	50% replacement library and health centre
<b>5</b>	Edgware Hospital (Major Thoroughfare)	Burnt Oak	Edgware Rd, Burnt Oak, HA8 0AD	366	25% hospital continuing in use, with associated car parking
<b>6</b>	Watling Avenue carpark & market (Burnt Oak Town Centre)	Burnt Oak	Barnfield Rd, Burnt Oak, HA8 0AY	229	40% mixed uses (station building, retail and car parking)
<b>7</b>	Beacon Bingo (Cricklewood Growth Area)	Childs Hill	200 Cricklewood Broadway, Cricklewood, NW2 3DU	132	30% leisure uses
<b>8</b>	Broadway Retail Park (Cricklewood Growth Area)	Childs Hill	Cricklewood Lane, Cricklewood, NW2 1ES	1,007	10% mixed uses (retail and community)
<b>9</b>	Colindeep Lane (adjacent to Northern Line) (Colindale Growth Area)	Colindale	Colindeep Lane, Colindale, NW9 6RY	138	-
<b>10</b>	Douglas Bader Park Estate (Estate Regeneration and Infill)	Colindale	Clayton Field, Colindale, NW9 5SE	200	Small quantum of community facilities and retail
<b>11</b>	KFC/ Burger King Restaurant	Colindale	Edgware Road, NW9 5EB	162	10% restaurant and takeaway food uses
<b>12</b>	McDonald's Restaurant	Colindale	157 Colindeep Lane, NW9 6BD	175	10% restaurant and takeaway food uses
<b>13</b>	Public Health England	Colindale	61 Colindale Avenue, NW9 5EQ/HT	1,020	5% community uses
<b>14</b>	Sainsburys The Hyde (Major Thoroughfare)	Colindale	Edgware Rd, The Hyde, NW9 6JX	1,309	25% mixed uses (retail, car parking and community)

<b>15</b>	Tesco Coppetts Centre (Major Thoroughfares)	Coppetts	Colney Hatch Lane, Friern Barnet, N11 0SH	397	25% mixed uses (retail, community facilities and car parking).
<b>16</b>	45-69 East Barnet Rd (New Barnet town centre)	East Barnet	45-69 East Barnet Rd, New Barnet, EN4 8RN	110	30% mixed uses (retail and office)
<b>17</b>	Danegrove Former Playing Field	East Barnet	Park Rd & Cat Hill, New Barnet, EN4 8UD	148	-
<b>18</b>	East Barnet Library	East Barnet	85 Brookhill Rd, New Barnet EN4 8SG	12	50% community use
<b>19</b>	East Barnet Shooting Club (New Barnet Town Centre)	East Barnet	Victoria Rd New Barnet EN4 9SH	43	-
<b>20</b>	Fayer's Building Yard & Church (New Barnet Town Centre)	East Barnet	63-77 East Barnet Rd & 15-17 Margaret Rd, New Barnet, EN4 9NR	25	30% re-provision of community use
<b>21</b>	New Barnet gasholder (New Barnet Town Centre)	East Barnet	Albert Rd, New Barnet, EN4 9SH	190	10% community use
<b>22</b>	Sainsburys (New Barnet Town Centre)	East Barnet	66 East Barnet Rd, New Barnet, EN4 8RQ	199	25% mixed uses (retail, B1 uses and car parking).
<b>23</b>	Bobath Centre (East Finchley Town Centre)	East Finchley	250 East End Rd, East Finchley, N2 8AU	25	75% community facility.
<b>24</b>	East Finchley station carpark (East Finchley Town Centre)	East Finchley	High Rd East, Finchley, N2 0NW	135	30% mixed uses (office and public car parking)
<b>25</b>	East Finchley substation (East Finchley Town Centre)	East Finchley	High Rd, East Finchley, N2 0NL	31	-
<b>26</b>	Park House (East Finchley Town Centre)	East Finchley	16 High Rd, East Finchley, N2 9PJ	44	20% mixed use (replacement community facility)
<b>27</b>	Edgware town centre (Edgware Growth Area)	Edgware	Station Rd, Edgware, HA8	2379	25% retail, office, office, entertainment and community
<b>28</b>	Edgware underground & bus stations (Edgware Growth Area)	Edgware	Station Rd, Edgware, HA8 7AW	2317	30% mixed uses (transport, retail, office and community)
<b>29</b>	Scratchwood Quarry	Edgware	NW7 3JA	-	Waste management

<b>30</b>	Finchley Central Station (Finchley Central/ Church End Town Centre)	Finchley Church End	Squires Lane/ Nether St/ Crescent St, Finchley N12 (railway verges and airspace above tracks and Finchley Central station)	556	50% mixed uses (transport, retail, offices, car parking)
<b>31</b>	Brentmead Place (Major Thoroughfare)	Golders Green	1-6 Brentmead Place (North Circular Road), Golder's Green, NW11 9JG	46	-
<b>32</b>	Manor Park Road carpark	Golders Green	72-76 Manor Park Rd, East Finchley, N2 0SJ	7	-
<b>33</b>	Bunns Lane Carpark (Mill Hill Town Centre)	Hale	Bunns Lane, Mill Hill, NW7 2AA	43	50% mixed uses comprising hotel and, re-provision of car parking
<b>34</b>	Burroughs Gardens Carpark (Middlesex University and The Burroughs)	Hendon	The Burroughs, Hendon, NW4 4AU	9	-
<b>35</b>	Egerton Gardens carpark (Middlesex University and The Burroughs)	Hendon	The Burroughs, Hendon, NW4 8BD	23	-
<b>36</b>	Fenella (Middlesex University and The Burroughs)	Hendon	The Burroughs, Hendon, NW4 4BS	60	10% educational uses.
<b>37</b>	Middlesex University Carpark (Middlesex University and The Burroughs)	Hendon	Greyhound Hill, Hendon, NW4 4BT	70	25% for retained replacement car parking
<b>38</b>	Ravensfield House (Middlesex University and The Burroughs)	Hendon	The Burroughs, Hendon, NW4 4BT	84	10% educational uses.
<b>39</b>	The Burroughs carpark (Middlesex University and The Burroughs)	Hendon	The Burroughs, Hendon, NW4 4AR	21	-
<b>40</b>	Meritage Centre	Hendon	28-46 Meritage Centre, Church End Hendon NW4 4JT	36	25% retained community uses
<b>41</b>	PDSA and Fuller St car park	Hendon	The Burroughs, Hendon, NW4 4BE	16	65% retained community uses and housing.
<b>42</b>	Usher Hall (Middlesex University and The Burroughs)	Hendon	The Burroughs, Hendon, NW4 4HE	39	-
<b>43</b>	Army Reserve Depot (Chipping Barnet Town Centre)	High Barnet	St Alban's Rd, Chipping Barnet, EN5 4JX	193	10% mixed uses (community and office)

<b>44</b>	High Barnet Station (Chipping Barnet Town Centre)	High Barnet	Great North Rd, Chipping Barnet, EN5 5P	292	25% mixed uses (public car parking and employment). Designated within UDP (2006) as Site 26 supporting B1 uses, hotel and leisure.
<b>45</b>	Whalebones Park	High Barnet	Wood St, Chipping Barnet, EN5 4BZ	149	10% mixed uses (community facilities and local green space)
<b>46</b>	IBSA House (Mill Hill Growth Area)	Mill Hill	The Ridgeway, Mill Hill, NW7 1RN	125	20% B1 uses
<b>47</b>	Mill Hill East Station (Mill Hill Growth Area)	Mill Hill	Bittacy Hill, Mill Hill, NW7 1BS – airspace above and land adjoining station	127	40% mixed uses (retained rail infrastructure, car parking)
<b>48</b>	Mill Hill Library	Mill Hill	Hartley Avenue, NW7 2HX	19	50% community uses
<b>49</b>	Watchtower House & Kingdom Hall (Mill Hill Growth Area)	Mill Hill	The Ridgeway, Mill Hill, NW7 1RS/ 1RL	219	60% retained open Green Belt and community uses
<b>50</b>	Watford Way & Bunns Lane (Major Thoroughfare)	Mill Hill	Adjacent to Watford Way, Mill Hill, NW7 2EX	105	-
<b>51</b>	Great North Road Local Centre (Major Thoroughfare)	Oakleigh	Great North Rd, New Barnet, EN5 1AB	84	60% mixed uses (cinema and public house)
<b>52</b>	Kingmaker House (New Barnet Town Centre)	Oakleigh	15 Station Rd, New Barnet, EN5 1NW	61	10% office use
<b>53</b>	Allum Way (Whetstone Town Centre)	Totteridge	Totteridge & Whetstone station/ High Rd/ Downland Close/ Allum Way, Whetstone, N20	888	20% mixed uses (office, B1c, community and car parking)
<b>54</b>	Barnet House (Whetstone Town Centre)	Totteridge	1255 High Rd, Whetstone, N20 0EJ	139	10% community and office use
<b>55</b>	Woodside Park Station east (Existing Transport Infrastructure)	Totteridge	Woodside Park Rd, Woodside Park, N12 8RT	95	20% re-provision of car parking
<b>56</b>	Woodside Park Station West (Existing Transport Infrastructure)	Totteridge	Station Approach, Woodside Park, N12 8RT	356	-
<b>57</b>	309-319 Ballards Lane (North Finchley Town Centre)	West Finchley	309-319 Ballards Lane, North Finchley, N12 8LY	130	20% mixed uses (retail, office and community)

<b>58</b>	811 High Rd & Lodge Lane carpark (North Finchley Town Centre)	West Finchley	811 High Rd & Lodge Lane, North Finchley, N12 8JT	132	30% mixed uses (retail, office and replacement public car parking)
<b>59</b>	Central House (Finchley/ Church End Town Centre)	West Finchley	1 Ballards Lane, Finchley N3 1UX	48	20% retail and office use
<b>60</b>	Finchley House (key site 3) (North Finchley Town Centre)	West Finchley	High Road & Kingsway North Finchley N12 0BT	202	20% mixed uses (office and community)
<b>61</b>	Tally Ho Triangle (key site 1) (North Finchley Town Centre)	West Finchley	High Rd, Ballard's Lane & Kingsway, North Finchley, N12 0GA/ 0GP	281	30% mixed uses (leisure, retail, office, transport, public car parking and community facilities)
<b>62</b>	Tesco Finchley (Central Finchley/ Church End Town Centre)	West Finchley	21-29 Ballard's Lane, Finchley, N3 1XP	170	25% mixed uses (retail, office and car parking)
<b>63</b>	Philex House (Major Thoroughfare)	West Hendon	110-124 West Hendon Broadway, West Hendon, NW9 7DW	48	-
<b>64</b>	744-776 High Rd (North Finchley Town Centre)	Woodhouse	744-776 High Rd, North Finchley, N12 9QG	175	20% retail and office use
<b>65</b>	Barnet Mortuary (former)	Woodhouse	Dolman Close Finchley N3 2EU	20	-
<b>66</b>	East Wing (key site 4) (North Finchley Town Centre)	Woodhouse	672-708 High Rd North Finchley N12 9PT/9QL	125	30% mixed uses (retail, office and cultural)
<b>67</b>	Great North Leisure Park (Major Thoroughfare)	Woodhouse	High Rd, Friern Barnet, N12 0GL	352	40% mixed uses (sports and leisure, community and replacement car parking)

### **Appendix 3 - List of Sites considered to be not developable**

<b>Site Name/Location</b>	<b>Reason for Rejection</b>
Land adjacent to the North Circular Road slip road off the High Road, known as 'The Roughlands'	Metropolitan Open Land (MOL)
Arkley View Arkley EN5	Green Belt
Badgers Croft Whetstone N20 8AH	Green Belt
Beech Hill Farm, Camlet Way Hadley Wood EN4 0NJ	Green Belt
Land adjacent to the A406, Colney Hatch Lane Muswell Hill N10	Metropolitan Open Land (MOL)
Land on the north side of Holden Road, Woodside Park, N12 7EA (Approx)	Metropolitan Open Land (MOL)
Land on the northeast side of Edgware Way Edgware HA8	Green Belt
Land South of Barnet Road (east of Glebe Lane), Arkley, EN5 3JY	Green Belt
Rear of St Peters Church of England, Barnet Road, Arkley, EN5 3JF	Green Belt
Rowley Bank Farm, Rowley Lane Arkley EN5 3HS	Green Belt
Woodfield Nursery, Cool Oak Lane West Hendon NW9 7BN	Metropolitan Open Land (MOL)
Former Copthall School Site, Page Street Mill Hill NW7 2EE	Green Belt
105 Camlet Way Hadley Wood EN5 0NJ	Green Belt
Brent Lodge Farm, May's Lane Arkley	Green Belt
Land east of Colney Hatch Lane Colney Hatch (between North Circular Rd & Cromwell Rd)	Metropolitan Open Land (MOL)
Land south of Barnet Road and east and west of Glebe Lane Arkley	Green Belt
Powerleague Barnet, Colney Hatch Lane & Trott Rd Colney Hatch	Metropolitan Open Land (MOL)
Rectory Farm, Camlet Way Monken Hadley EN5 0NJ	Green Belt
Rowley Lane Sports Ground, Rowley Lane Arkley	Green Belt
Colney Hatch Lane & Cromwell Rd Muswell Hill N10	Metropolitan Open Land (MOL)
Frith Lane Mill Hill NW7 1PY	Green Belt
Arkley Village Hall, Brickfield Lane Arkley EN5 3LD	Green Belt
Mays Lane agricultural land, adj to The Thrift Arkley EN5 2AG	Green Belt and Site of Importance for Nature Conservation (SINC)
Quinta Club, May's Lane Arkley EN5 2AP	Green Belt
Land off Tillingham Way Woodside Park N12 7EN	Metropolitan Open Land (MOL)
Golders Green Bus and Underground station, North End Road/Finchley Road	TfL has not further progressed this location as part of its site portfolio
Rear of 2-20 Alverstone Ave Oakleigh Park EN4 8DS/8DU	Classification as a Site of Local Importance for Nature Conservation (SINC)
Finchley Memorial Hospital, Granville Rd Finchley N12 0JE	The hospital was constructed under permission granted in 2010 (application F/03573/09), following Mayoral call-in. The loss of a playing field was accepted on condition of

	providing new open space, increasing public access and create new playing fields for community uses.
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## **Appendix 4 - Density matrix from the London Plan (2016)**

Setting	Public Transport Accessibility Level (PTAL)		
	0 to 1	2 to 3	4 to 6
<b>Suburban:</b>	150–200 hr/ha	150–250 hr/ha	200–350 hr/ha
<b>3.8-4.6 hr/unit</b>	35–55 u/ha	35–65 u/ha	45–90 u/ha
<b>3.1-3.7 hr/unit</b>	40–65 u/ha	40–80 u/ha	55–115 u/ha
<b>2.7-3.0 hr/unit</b>	50–75 u/ha	50–95 u/ha	70–130 u/ha
<b>Urban:</b>	150–250 hr/ha	200–450 hr/ha	200–700 hr/ha
<b>3.8 -4.6 hr/unit</b>	35–65 u/ha	45–120 u/ha	45–185 u/ha
<b>3.1-3.7 hr/unit</b>	40–80 u/ha	55–145 u/ha	55–225 u/ha
<b>2.7-3.0 hr/unit</b>	50–95 u/ha	70–170 u/ha	70–260 u/ha
<b>Central:</b>	150–300 hr/ha	300–650 hr/ha	650–1100 hr/ha
<b>3.8-4.6 hr/unit</b>	35–80 u/ha	65–170 u/ha	140–290 u/ha
<b>3.1-3.7 hr/unit</b>	40–100 u/ha	80–210 u/ha	175–355 u/ha
<b>2.7-3.0 hr/unit</b>	50–110 u/ha	100–240 u/ha	215–405 u/ha

Appropriate density ranges are related to setting in terms of location, existing building form and massing, and the index of public transport accessibility (PTAL). The setting can be defined as:

- central – areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 m walking distance of an International, Metropolitan or Major town centre.
- urban – areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 m walking distance of a district centre or, along main arterial routes
- suburban – areas with predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically buildings of two to three storeys.

### Explanation of terms:

- u / ha = units per hectare, i.e. the density of housing units
- hr / unit = habitable rooms per residential units (a habitable room is one used for sleeping, cooking, living or eating)