

Barnet Local Plan Examination

Matter 10 – Site Allocations (Site No. 67 Great North Leisure Park)

Hearing Statement prepared on behalf of Regal London

6 September 2022

1. Introduction

- 1.1 This Statement has been prepared by Avison Young on behalf of Regal London, an interested party in the Great North Leisure Park site in North Finchley (Site Allocation No. 67). The Great North Leisure Park site comprises a cinema, bowling alley, restaurants, the Finchley Lido Leisure Centre and car parking.
- 1.2 This statement sets out our comments with respect to the issues and questions raised by the Inspectors regarding Matter 10, as relevant to the Great North Leisure Park.

2. Question 1 – Are the proposed site allocations appropriate and justified in the light of potential constraints, infrastructure requirements and adverse impacts?

Summary of Site No. 67 Allocation

- 2.1 Site No. 67 in the Regulation 19 version of the draft Local Plan (as proposed to be amended through the Council's Table of Proposed Modifications) identifies the Great North Leisure Park site as being suitable for '*residential led mixed use development with commercial, leisure and community uses*'. Draft allocation Site No. 67 identifies an indicative residential capacity for the site of 352 homes.
- 2.2 The site requirements and development guidelines state that '*there is potential for comprehensive or infill residential development utilising space released by existing surface car parking, allowing better integration into the surrounding residential environment for more efficient and sustainable use of space. There should be no additional floorspace of leisure and commercial floorspace in use for restaurants and cafes and sui generis take away uses, which should be located in town centres. Proposals must reflect the context of a major thoroughfare and respond to the adjacent MOL. Further masterplanning will be required in the event of comprehensive redevelopment. Due to the low PTAL, proposals should include measures that contribute towards modal shift away from private car use to more sustainable means of transport*'.
- 2.3 In addition the Proposed Modifications confirm '*Tall (but not Very Tall) Buildings may be appropriate, however, all tall building proposals will be subject to a detailed assessment of how the proposed building relates to its surroundings (with height of neighbouring buildings being of foremost consideration) responds to topography, contributes to character, relates to public realm, natural environment and digital connectivity. Further guidance will be provided by the Designing for Density SPD*'.

Justification and Appropriateness

- 2.4 Allocation Site No. 67 correctly identifies the potential site constraints, which are listed as being adjacent to Metropolitan Open Land (MOL), a Local Nature Reserve (Glebelands) and Site of Importance for Nature Conservation (SINC).
- 2.5 The opportunities of the site are also worth noting, specifically:
- Flood Zone 1 (low risk of flooding from rivers)
 - Emerging designation as a Major Thoroughfare.
- 2.6 All potential constraints, infrastructure requirements and adverse impacts will be able to be addressed through appropriate mitigation measures during the application process.
- 2.7 In this regard we consider the allocation of the site for residential-led mixed use development with commercial, leisure and community uses is appropriate and justified.
- 2.8 We consider the appropriateness of the identified site capacity in response to Question 4.
3. **Question 2 – Is there any risk that any infrastructure requirements, site conditions and/or constraints might prevent or delay development or adversely affect viability and delivery?**
- 3.1 Initial site survey work has been undertaken which has not identified any potential constraints which might prevent or delay the redevelopment of the site being delivered.
4. **Question 3 – Are the site allocation boundaries justified?**
- 4.1 The proposed boundary for Site No. 67 is considered to be appropriate and justified.
5. **Question 4 – Are the assumptions regarding the capacity of the sites in terms of density of development and net developable areas justified and what is this based on?**

Calculating Density

- 5.1 Annex 1 of the Regulation 19 version of the draft Local Plan provides a schedule of site allocations and provides an overview of the Council's method for assessment indicative residential capacity of sites. These are based on the site area and public transport accessibility level (PTAL) of each site which is then used to determine a range of appropriate dwelling densities. This density matrix approach draws on the matrix which was formerly part of the previous London Plan (2016).
- 5.2 Annex 1 also confirms that where the site is expected to have other uses in addition to residential, the percentage of uses detailed in the allocation for each use have also been applied.
- 5.3 At Great North Leisure Park, Site No. 67 confirms a site area of 3.45 ha, a PTAL of 1B in 2019 (increasing to 2 in 2031), and that the site is 'urban' in nature. Against the target densities, the maximum capacity of the site is equivalent to 587 homes. However the Regulation 19 version contained a proposed 60:40 split of development between residential use and commercial / leisure / community use. As such the apportioned number of homes reduces the a site capacity of 352 homes (the figure stated in Site No. 67).
- 5.4 We note that the Proposed Modifications remove the 60:40 split on the site, a move which we consider to be appropriate and justified.

5.5 However, this means that the indicative capacity of Site No. 67 is no longer based on accurate methodology, as the capacity of the site should no longer be apportioned.

5.6 Section 4 of the Council's Housing Technical Paper confirms the approach the London Borough of Barnet (LBB) have taken towards site allocation capacity. The Housing Technical Paper is explicit that indicative capacities within site allocations are intended to be high level assessments that will be firmed up by further design and masterplanning work. The Council consider that undertaking extensive design options for each allocation would not be proportionate or reasonable as part of the Local Plan process.

Is the approach justified?

5.7 Fundamentally we are concerned that such an approach is flawed and not in line with the latest London Plan (2021) (which removes the density matrix), specifically London Plan Policy D3 which seeks to optimise site density through a design-led approach.

5.8 We consider that the assumptions regarding the capacity of the site (even if the unapportioned figure is used), significantly underestimates the potential capacity of the site to deliver new homes.

5.9 There is no clear policy wording proposed which clarifies that the indicative residential capacities do not represent appropriate targets or caps for development, and that appropriate residential capacity will be assessed on a case-by-case basis, using a design-led approach.

5.10 We note that some site allocation capacity figures have been based on pre-application schemes under consideration by the Council.

5.11 In order to ensure that the proposed capacity of the site is fully justified, we consider that the Council should consider the initial site capacity work being undertaken by the design and professional team which identify that the comprehensive redevelopment of the site could deliver at least 1,000 new homes, within the recommended building heights set out in the allocation.

5.12 In light of this, it is challenging for the Council to demonstrate that the 352 home figure is appropriate or justified, however flexibly LBB intend to take the site allocation capacity into consideration at planning application stage.

6. Question 5 – What is the expected timescale for development in terms of lead in times and annual delivery rates, and are these assumptions realistic and supported by evidence?

6.1 Site No. 67 includes a development timeframe of 6-10 years.

6.2 It is anticipated that a planning application for the comprehensive redevelopment of the site will be submitted in 2023. On this basis we consider that it would be reasonable to assume that some of the early phases of development could be delivered within years 0-5, with later scheme phases being delivered over the 6-10 year period.

7. Question 6 – Does the Plan sufficiently make clear the infrastructure requirements for each of the allocated sites, together with the timing of and dependencies upon such infrastructure for their delivery?

7.1 There are no infrastructure requirements listed for Site Ref. 67.

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8. **Question 7 – Are the proposed allocations and the associated development requirements and principles identified in Annex 1 of the Plan - justified, effective, consistent with national policy and in general conformity with the London Plan?**
- 8.1 The proposed development requirements provide sufficient flexibility for either an infill development, or a comprehensive development (as part of a masterplan approach) to come forward on the site.
- 8.2 In line with the London Plan, the Proposed Modifications to Site Ref. 67 identify that the site is suitable for Tall Buildings.
- 8.3 We consider the Council's proposed modifications to Site Ref. 67 which removes the numerical percentage quantum figures for proposed uses to be necessary to make the allocation justified, effective, consistent with national policy and in general conformity with the London Plan.
- 8.4 The main issue with the draft allocation for Site Ref. 67 relates to the unjustified and low residential capacity identified (see response to Question 4 above). In this regard we consider that the allocation is not consistent with London Plan Policy D3 which promotes optimisation of sites in line with a design-led approach.
9. **Question 8 – Are any further modifications required to ensure that the relevant policies for each site and/or their development requirements identified in Annex 1 are accurate and sound?**
- 9.1 There are no further modifications required to the draft allocation for Site Ref. 67.

Avison Young
6 September 2022