

Barnet Local Plan EIP – Note on the Housing Supply Position – April 2024

This Note provides an update on the Local Plan's housing supply following revisions made to the Plan as a consequence of the Inspectors' Interim Findings and Next Steps Letter of August 17th 2023.

The Note includes a revised Housing Trajectory at Appendix A (replacing EXAM 87) which provides a full breakdown of supply over the Local Plan period. In order to set out the position as at April 2022 the Note also includes (at Appendix B) a 15 year Housing Supply which goes beyond the Local Plan period to provide an overview for the next fifteen years. A summary table on new homes delivery (informing the revised Local Plan Table 5 replacing the version in EXAM 90) is based on the Housing Trajectory (Appendix A) while the 5 year housing supply calculation (Appendix C) is based on the 15 year Housing Supply (Appendix B)

The revised Housing Trajectory (Appendix A) shows new ward names (together with previous ones for comparison and consistency with EXAM 87). The Council will only show the new ward names when the Housing Trajectory is published at the time that the Local Plan is adopted. Each site listed also has a Local Plan Designation and a Status ie Consent, Proposed Allocation, Completed etc.

In terms of the housing supply expected to be delivered by the Plan, the overall numbers have reduced from **46,000** new homes as set out in the Reg 19 Local Plan to 43,883 new homes in April 2024. This is reflected in the Housing Trajectory which shows actual housing supply numbers for the fifteen-year period of the Local Plan. The totals set out in Table 5 reflect rounding down to the nearest 10 dwellings for each identified location, category and time period. Therefore Table 5 shows a rounded down number of 43,700 new homes as total supply in the Plan.

A more detailed breakdown of the components of housing supply by individual Growth & Spatial Strategy (GSS) Policy can be found by using the Excel filters in the Housing Trajectory in Appendix A.

Numbers in the Local Plan have changed for the following reasons :

- **Brent Cross Growth Area** – Reg 19 figure of 9,500 new homes is from London Plan Table 2.1 - Opportunity Area Indicative capacity for new homes and jobs and relates to the wider Brent Cross Cricklewood Opportunity Area. Revised figure reflects the 2010 outline planning permission which was subsequently amended in 2014 for the comprehensive redevelopment of the whole of the Brent Cross Growth Area including delivery of 7,492 new homes. The number in the Housing Trajectory reflects updated delivery expectations on the build out of the S73 consent F/04687/13 within the lifetime of the Plan and beyond it. This has been rounded down to 7,420 new homes (as shown by Table 5) within the lifetime of the Plan.
- **Brent Cross West Growth Area** – Reg 19 figure of 1,800 new homes to be delivered in Years 11 to 15 of the Plan, remains unchanged from Reg 19.
- **Cricklewood Growth Area** – Reg 19 figure of 1,400 new homes in the Growth Area reflects 2 existing consents in the Growth Area (as shown in Appendix A), application

of Central densities for indicative capacities at site proposals (Site 7 – Beacon Bingo) and (Site 8 – Broadway Retail Park) and the Town Centre windfall uplift in years 11 to 15. New homes delivery figure of 1,360 reflects the 3 existing consents, removal of the uplift better reflects context and application of Urban densities to indicative capacities. The new homes delivery figure of 1,360 new homes reflects uplifts associated with the recent grant of planning permission by the Secretary of State at Broadway Retail Park for 1,049 dwellings on 4 December 2023. The Council is proposing this higher figure in the proposed MMs based on the evidence in the Updated Table 5, when compared with the Inspectors letter of August 2023.

- **Brent Cross Cricklewood Opportunity Area** – this extensive Opportunity Area is designated in the London Plan. It includes the Brent Cross Growth Area (GSS01 & GSS02 - minimum of 7,420 new homes), Brent Cross West Growth Area (GSS01 & GSS03 - approximately 1,800 new homes) and Cricklewood Growth Area (GSS01 & GSS04 - approximately 1,360 new homes). The total number of new homes in these Growth Areas accord with the expectations of 9,500 dwellings for the Opportunity Area in the London Plan (with a margin of flexibility of around 12%).
- **Edgware Growth Area** – Reg 19 figure of 5,000 new homes within the Growth Area reflects proposals at Site 27 - Edgware Town Centre and Site 28 - Edgware Underground and bus stations as well as consents as shown in Appendix A. One consent at Premier House forms part of Site 27 and this is reflected in the Housing Trajectory. Target for Edgware has been reduced to approximately 4,740 new homes. This reflects rounding down and removal of the Growth Area windfall uplift in years 11 to 15. The Council is proposing this lower figure in the proposed MMs based on the evidence in the Updated Table 5, when compared with the Inspectors letter of August 17th 2023.
- **Colindale Growth Area** – Reg 19 figure of 4,100 new homes has increased to 5,190 new homes as a consequence of a combination of reductions including removal of Site 9 – Colindeep Lane from the Plan, reduced indicative capacities at Sites 11, 12 and 13 together and increases resulting from a re-examination of delivery of the consents for Stages 2 and 3 of the Colindale Gardens development (H/04753/14, 16/7836/S73, 19/6512/OUT).
- **Mill Hill East** – Reg 19 figure of 1,500 has increased to 2,280 new homes as a consequence of the planning consent (22/0649/FUL for 184 units) at Site 49 – Watchtower House as well as the remaining build out of NIMR (16/4545/FUL) which previously had not been counted as an element of housing supply in Mill Hill East. Another reason explaining the revised number is the re-examination of delivery of the consents for remaining phases of the Millbrook Park development (H/03904/12, 15/0641/OUT, 19/5827/FUL). The Council is proposing this higher figure in the proposed MMs based on the evidence in the Updated Table 5, when compared with the Inspectors letter of August 2023.
- **District Town Centres** – Reg 19 figure of 5,400 new homes reflects assumptions about a windfall uplift in years 11 to 15 of 50 units per District Town Centre. A total of 650 units has been removed for this reason. Numbers have dropped in order to reflect application of Urban (rather than Central) densities at sites in North Finchley, combined with new planning consents and re-examination of considerations behind indicative capacities in certain town centre sites together with the removal of Site 6 –

Watling Avenue Car Park and Market in Burnt Oak from the Plan. There has also been further analysis of the categories of designation with a number of sites being moved between Other Sites, Major Thoroughfares and Town Centres as these are more appropriate designations, reflecting location of the site. This includes the Hendon Hub sites which now fall under Town Centres. Total supply for District Town Centres is now 5,100 new homes.

- **Existing & New Major Transport Infrastructure** - Reg 19 figure of 1,650 new homes reflects assumptions about uplifts resulting from the West London Orbital (WLO) in years 11 to 15 of the Plan. Upon reflection the Council considers that the WLO station locations that would realise this capacity are undefined and that it would not be justified to consider them as broad locations for growth in the same way as Brent Cross West (Staples Corner) and New Southgate. A total of 1,220 units has therefore been removed and the overall total has decreased to 420 new homes which comprises Site 55 – Woodside Park Station East and Site 56 – Woodside Park Station West and an uplift for the broad location of New Southgate Opportunity Area in years 11 to 15.
- **Estate Renewal & Infill** – Reg 19 figure of **4,400** new homes has decreased to 3,980 new homes to reflect re-examination of consented schemes and ensure that demolitions of stock have been fully accounted for.
- **Major Thoroughfares** – Reg 19 figure of **3,350** new homes has increased slightly to 3,530 new homes for a range of reasons including reductions with sites reverting back to numbers in existing or extant consents at a number of Local Plan proposal sites including Site 5 – Edgware Hospital and Site 63 – Philex House and increases with a number of sites being moved from Other Sites to Major Thoroughfare.
- **Other sites** – Reg 19 figure of **2,800** new homes has increased to 2,870 new homes, reflecting a combination of factors including identification of new planning consents of 10 units or more identified on Barnet’s Housing Trajectory and those that do not fall into any of the other categories under GSS01. Another factor is the recalculation of the ratio of student accommodation to dwellings at proposals sites around Middlesex University (Hendon Hub). The Hendon Hub sites contribute to calculations for nearby District Town Centres due to their locations being within 400 metres of either Brent Street or Hendon Central town centres. This is balanced by the removal of capacity behind car park development as well as extant unimplemented planning consents identified by the updated Housing Trajectory. As highlighted above the transfer of sites to other GSS categories has reduced the numbers for Other Sites.
- **Note that numbers in Table 5 have been rounded down. Numbers in Appendix A Housing Trajectory are actual figures.**
- **Numbers used in Tables 4 and 5A reflect the actual indicative capacities of Local Plan site proposals and therefore have not been rounded.**
- **The Local Plan Housing Trajectory is best explained through an Excel spreadsheet. This is attached as Appendix A. [here](#)**

- Similarly the 15 year Housing Supply is best explained through an Excel spreadsheet. This is attached as Appendix B. [here](#)

Updated (Local Plan) Table 5 - New Homes Delivery – 2021/22 to 2035/36¹

		Years 1-5	Years 6-10	Years 11-15	Total Supply
		2021/22 – 2025/26	2026/27 – 2030/31	2031/32 – 2035/36	
Growth Areas and Mill Hill East	<i>Brent Cross</i>	1,330	3,020	3,070	7,420
	<i>Brent Cross West</i>	-	-	1,800	1,800
	<i>Cricklewood</i>	160	1,200	-	1,360
	<i>Edgware</i>	170	2,750	1,820	4,740
	<i>Colindale</i>	2,690	2,500	-	5,190
	<i>Mill Hill East</i>	1,850	310	120	2,280
	Growth Areas and Mill Hill East Sub-Total	6,200	9,780	6,810	22,790
District Town Centres	<i>Brent Street</i>	0	260	0	260
	<i>Burnt Oak</i>	160	0	0	160
	<i>Chipping Barnet</i>	50	290	190	530
	<i>Colindale - The Hyde</i>	0	0	0	0
	<i>East Finchley</i>	20	70	130	220
	<i>Finchley Central Church End</i>	40	650	130	820
	<i>Golders Green</i>	0	0	0	0
	<i>Hendon Central</i>	70	50	0	120
	<i>New Barnet</i>	370	690	40	1100
	<i>North Finchley</i>	80	740	0	820
	<i>Mill Hill</i>	0	50	0	50
	<i>Temple Fortune</i>	0	0	0	0
	<i>Whetstone</i>	430	590	0	1,020
		District Town Centres Sub-Total	1,220	3,390	490
Existing & New Major Transport Infrastructure	Cross Rail 2 (New Southgate Opportunity Area)	0	0	250	250
	Existing Public Transport Nodes	80	90	0	170
	Existing & New Major Transport Infrastructure Sub-Total	80	90	250	420
	Estate renewal & infill	1,090	1,840	1,050	3,980
	Major Thoroughfares	620	2,810	-100	3,530
	Other sites	880	1,990	0	2,870
	Small Sites (under 0.25 ha)	1,590	1,710	1,710	5,010
	Total	11,680	21,610	10,410	43,700

¹ These figures are (subject to rounding) in alignment with the Local Plan Housing Trajectory in Appendix A. They inform the Main Modifications to Table 5 in the Local Plan.

(Local Plan) Table 4 Contribution of Identified Sites on Sites Schedule to New Homes Delivery from Small and Medium Sites

	Years 1-5	Years 6-10	Years 11-15	Total
Large sites of 1 ha and over	316	8429	2276	11021
Medium Sites (0.25 ha and over but below 1ha)	60	1751	283	2094
Small Sites 0.25 ha and below	0	216	0	216
Contribution from Sites Schedule Total	376	10396	2559	13331

(Local Plan) Table 5A Contribution of Identified Sites on Sites Schedule to New Homes Delivery

	Years 1-5	Years 6-10	Years 11-15	Total
Growth Areas	184	3555	1947	5686
District Centres	0	4319	464	4783
Existing & Major New Public Transport Infrastructure	86	95	0	181
Estate renewal & infill	0	0	0	0
Major Thoroughfares	106	927	105	1138
Other sites	0	1500	43	1543
Contribution from Sites Schedule Total	376	10,396	2559	13,331

Appendix C: 5 Year Housing Land Supply Calculation

Further to additional engagement with developers and confirmation on the status of a number of sites, as outlined within this Note, the Council have provided an update to the 5 Year Housing Land Supply (5YHLS) calculation.

The Council notes NPPF (para 226) which highlights that from the date of its publication on 19 December 2023 and for decision-making purposes only, certain local planning authorities which have an emerging local plan that has either been submitted for examination or has reached Regulation 18 or Regulation 19 (Town and Country Planning (Local Planning) (England) Regulations 2012) stage, including both a policies map and proposed allocations towards meeting housing need be required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of four years' worth of housing against the housing requirement set out in adopted strategic policies. Nonetheless, the 5 year housing supply calculation in Table 1 is set out for the purpose of the Local Plan Examination which is subject to the transitional arrangements in NPPF para 230 and therefore, necessarily examined under the previous version of the NPPF published on 5 September 2023.

Barnet's target as set out in the London Plan (2021) is to deliver 2,364 net new homes per year. The 5YHLS calculation takes into account the shortfall in delivery since the beginning of the London Plan period (2019) and includes a 5% buffer as required by the NPPF para 74 where the Council has not formally sought to demonstrate a five year supply of deliverable sites through the adopted plan (5 September 2023 version) and reflects the publication of the 2022 Housing Delivery Test (HDT) Measurement which shows that Barnet have delivered 107% against the HDT requirement.

Based on current consents and the projected delivery of allocated sites (including small sites), Barnet can demonstrate a deliverable supply of **5.09 years**. The most up-to-date position on housing supply in April 2024 using a base date for the calculation of April 2022 is shown in Table 1 and represents a decrease on the position set out in EXAM86 which was published in March 2023. Table 2 provides a breakdown of the 5 Year Supply.

TABLE 1 - 5 YEAR HOUSING LAND SUPPLY CALCULATION as at April 2024 (calculation base date of April 2022)		
A	Housing target for past plan period (2019/20 - 2021/22)	7,092
B	Housing completions for past plan period (2019/20 - 2021/22)	6,546
C	Shortfall (A-B)	546
D	Five year target (2022/23 - 2026/27) (2,364 x 5)	11,820
E	Five year requirement (shortfall + five year target) (C+D)	12,366

F	Five year requirement + 5% buffer	12,984
G	Annual five year requirement + 5% buffer (F/5)	2,596
H	Housing supply (2022/23 – 2026/27)	13,237
I	Housing land supply years + 5% buffer (H/G)	5.09

TABLE 2 - TOTAL IDENTIFIED 5 YEAR SUPPLY						
	2022-23	2023-24	2024-25	2025-26	2026-27	TOTAL
Consented	1,244	2,039	2,547	2,295	3,141	11,266
Allocation	0	0	0	46	95	141
Other ²	0	0	0	60	60	120
Small sites (under 10 units)	342	342	342	342	342	1,710
	1,586	2,381	2,889	2,743	3,638	13,237

² Land Adjacent Northway and Fairway Primary School - Permission was granted on 8 April 2016 (15/03138/FUL) and lapsed. The site is vacant and formerly accommodated the old Northway and Fairway Primary School. The site is part of the Council's Asset Disposal Programme and the Council has secured development partners for a Build to Rent scheme at a greater density than the lapsed consent. The Council's Housing and Growth Committee on 14th June 2021 approved proposed sale and leaseback approach to the development of the site; the Kuropatwa Group was approved as the preferred developer. Council is currently in the stages of completing a contract with the developer this month. The Council intends to develop this site where the principle of residential has already been accepted. It therefore includes the extant permission for 120 units in the 5YHLS to be delivered in years 4 and 5.

