

North London Business Park, Oakleigh Road South

in the London Borough of Barnet

planning application no. 15/07932/OUT

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Hybrid planning application for the phased comprehensive redevelopment of the North London Business Park to deliver a residential-led mixed use development. The detailed element comprises 376 residential units in five blocks reaching eight storeys, the provision of a 5 form entry secondary school, a gymnasium, a multi-use sports pitch and associated changing facilities and improvements to open space and transport infrastructure, including improvements to the access from Brunswick Park Road and; the outline element comprises up to 824 additional residential units in buildings ranging from two to eleven storeys, up to 5,177 sqm of non-residential floor space (use Classes A1-A4, B1 and D1) and 2.9 hectares of open space. Associated site preparation/enabling work, transport infrastructure and junction work, landscaping and car parking.

The applicant

The applicant is **Comer Homes Group** and the architect **Plus Architecture**.

Strategic issues

The principle of the residential-led mixed-use redevelopment of this site is supported. However, there are a number of outstanding strategic planning concerns relating to **employment, education, affordable housing, housing, urban design, climate change** and **transport**.

Recommendation

That Barnet Council be advised that, whilst the principle of a residential-led mixed use development of the site is supported, the application does not comply with the London Plan, for the reasons set out in paragraph 78 of this report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan.

Context

1 On 27 January 2016 the Mayor of London received documents from Tower Hamlets Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 8 March 2016 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that

view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following Categories of the Schedule to the Order 2008:

- Category 1A: *"Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats"*.
- Category 1C: *"Development which comprises or includes the erection of a building more than thirty metres high and outside the City of London"*.
- Category 3B: *"Development which occupies more than 4 hectares of land which is used for Use Class B1 purposes and is likely to prejudice the use of that land for that use"*.

3 Once Barnet Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 The site measures 16.53 hectares and comprises four main buildings in campus style layout that have been in use primarily for office purposes since 2002, but previously were the STC industrial telecoms production site and more recently Nortel research centre (vacated 2002). Approximately 13 hectares is unoccupied by buildings, comprising associated car parking, parkland style landscaping and a former sports facility at the northern end of the site. The site is bounded to the west by the East Coast Mainline and to the north and south by the backs of residential properties. Access is from a short frontage on Oakleigh Road South close to the railway bridge, whilst there is also a secondary frontage and access along Brunswick Park Road. The existing buildings total around 38,000 sq.m. of office and educational floorspace, with St Andrew the Apostle School occupying one of the buildings. Barnet Council occupy the majority of the office floorspace, but are relocating elsewhere. There is a significant level change of around 22 metres across the site running down from north-west to south-east.

7 The surrounding area is generally suburban in character, comprising predominantly two storey semi-detached and terraced housing. Part of the site is designated as a strategic industrial location in the London Plan, as an identified Industrial Business Park (IBP). There are also a number of mature trees on site, many of which are protected by tree preservation orders, as well as a lake that provides functional drainage and wildlife habitat.

8 The nearest section of Strategic Road Network (SRN) is located approximately 2km northwest of the site at the A1000 High Road, whilst the nearest Transport for London Road Network (TLRN) is located at A406 North Circular Road Road/Bowes Road approximately 2 km south-west. The site is remote from the nearest station; Arnos Grove Station, served by the Piccadilly line is located 2km to the south. The eastern part of the site is served by one bus route (382) whilst the southern part is served by two routes (251 & 34). As such, the Public Transport Accessibility Level (PTAL) of the site ranges from a very poor 1b to a low 2 (where 1 is the lowest and 6 is the highest).

Details of the proposal

9 Comer Homes Group (the applicant), is seeking full planning permission for the redevelopment of the site for a mix of uses including 1,200 residential units, 5,177 sq.m. of non-residential floorspace (Use Classes A1-A4, B1 and D1), a 5-form entry secondary school, gymnasium, multi-use sports pitch with changing facilities and 2.9 hectares of public open space. The application is submitted in hybrid form, as detailed below:

Detailed element

- 376 residential units in five blocks up to eight storeys.
- 5-form entry secondary school, as a replacement and enlargement of the existing St Andrew the Apostle School.
- Gymnasium, multi-use sports pitch and associated changing facilities.
- Improvements to open space and transport infrastructure, including access from Brunswick Park Road.

Outline element

- 824 residential units in buildings ranging from two to eleven storeys.
- Up to 5,177 sq.m. of non-residential floorspace for retail, employment and community use.
- 2.9 hectares of public open space.

Case history

10 The proposal considered here was subject to formal pre-application discussions with GLA officers, with a formal pre-application meeting being held on 25 June 2015. GLA officers supported the principle of the proposed mix of uses. The key strategic concerns raised included housing, affordable housing, design, inclusive design, energy and transport.

Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

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|-----------------------------|---|
| • Principle of development | <i>London Plan; Land for Industry and Transport SPG</i> |
| • Housing | <i>London Plan; Housing SPG; draft interim Housing SPG; Housing Standards Policy Transition Statement; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG; Social Infrastructure SPG</i> |
| • Affordable housing | <i>London Plan; Housing SPG; draft interim Housing SPG; Housing Standards Policy Transition Statement; Housing Strategy</i> |
| • Density | <i>London Plan; Housing SPG; draft interim Housing SPG; Housing Standards Policy Transition Statement; Housing Strategy</i> |
| • Urban design and heritage | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; draft interim Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG</i> |
| • Inclusive access | <i>London Plan; Accessible London: achieving an inclusive environment SPG</i> |

- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- Transport and parking *London Plan; the Mayor's Transport Strategy*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy*

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is Barnet Council's Core Strategy (2012) and Development Management Policies DPD (2013), and the 2015 London Plan (Consolidated with Alterations since 2011). The draft Minor Alterations to the London Plan (2015), the draft North London Business Park Planning Brief (2016), and the National Planning Policy Framework and Technical Guide to the National Planning Policy Framework, are also relevant material considerations.

Principle of development

Employment

13 Part of the site is currently designated as a strategic industrial location in the London Plan, identified as an Industrial Business Park (IBP), as defined by London Plan Policy 2.17. However, owing to the site's location, the type and quality of office accommodation relative to the needs of the current market, the occupation of the office space on the site has decreased significantly in recent years. At present, Barnet Council is the single largest tenant on site, occupying 55% of the total floorspace. However, they plan to vacate the buildings by November 2017 and after this time the majority of buildings will be vacant and given the site's remote location from public transport or town centres such large scale outer London offices are unlikely to be re-let.

14 Paragraph 22 of the NPPF states that "planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities".

15 Therefore, notwithstanding the strategic identification and policy issue in the London Plan, the NPPF recognises that designations such as this can be reviewed where there is no reasonable prospect of continued use. This has been strategically acknowledged by the Council, whose Core Strategy recommends that the site be redeveloped for a mix of uses and a draft Planning Brief has been prepared and consulted upon, which promotes comprehensive residential-led redevelopment.

16 As mentioned, once Barnet Council vacate the site, the majority of the buildings would be vacant. The main employment generating use that would remain is the Comer Innovation Centre, which offers short term leasing arrangements for SMEs. It is expected that 300-400 employees would remain, which given the size of the site would not be compatible with an IBP designation. Furthermore, the supporting text to London Plan Policy 2.17 recognises that IBPs are not intended for primarily large scale office development, which should be located in town centres. The site is also poorly located relative to public transport, the strategic road network and freight interchanges, so there is no reasonable prospect of an alternative large scale industrial or research and development scheme coming forward.

17 The proposal would provide a new small scale office facility with incubator space, along with a secondary school, retail and community space. Overall, the numbers of jobs across the site are expected to increase, albeit a different type of employment mix, and the new jobs associated with the B1 office space are expected to be around 220. The proposed B1 floorspace would be similar to

the current Comer Innovation Centre, with short term lets and smaller, modern, flexible office floorplates. This type of space would better reflect the modern needs of the local economy.

18 Overall therefore, GLA officers accept that the IBP designation is becoming increasingly obsolete and inappropriate to the strategic employment role of this site and, in line with the NPPF, there is the opportunity to deliver a mixed use development that will better reflect the needs of the local community, whilst retaining some SME/incubator employment to serve local start-up businesses. The proposed mixed-use redevelopment, which would deliver a mix of appropriate uses including a significant quantum of residential, is therefore supported in principle. The Council are requested to secure the delivery of the employment space, including controls over terms and rent levels for SMEs, through the S106 agreement.

Education

19 The St Andrew the Apostle Free School currently occupies one of the buildings on site, operating as a 2-form entry secondary school. The application seeks to replace this facility in a new purpose built campus fronting Brunswick Park Road, expanding this to 5-forms of entry. The replacement of the school in a modern, fit for purpose facility with increased prominence on the site is strongly supported, subject to addressing any increased movement and transport impacts the expanded school is likely to generate.

20 The proposed secondary school provision would go beyond that required to mitigate the impacts of the development and would serve the existing community, which is supported. The Council should however confirm that the primary school child yield of the development can be met through expansion of existing schools and if necessary secure appropriate mitigation as part of this application, given the deficit of spaces identified in the Environmental Statement.

Retail and community uses

21 Small scale retail units (2,017 sq.m. GIA) and community uses (744 sq.m. GIA) are also proposed. These uses would animate ground floor frontages and provide local walk-to facilities for the new residents, which is supported. The Council should consider imposing restrictions on the maximum size of retail units so that the future retail function does not impact on nearby parades or town centres.

Sport facilities

22 The northern area of the site was historically used as a private sports field for the former STC/Nortel business occupiers, and associated changing facilities/club, however it is understood that this has not been in use since the 1990s. The detailed proposals for the school include provision of an all-weather sports pitch, an indoor sports hall and a multi-use games area (MUGA) on the roof of the building. These facilities would be managed and maintained by the school, but are proposed to be made available to the wider community outside of school hours, which is welcomed. GLA officers consider that the proposed sports facilities provision would adequately mitigate against the loss of the historic sports facilities on the site and the proposal would therefore comply with London Plan Policy 3.19. The Council should secure terms for community access to these facilities through the S106 agreement.

Housing

23 Policies 3.3 and 3.4 of the London Plan recognise the need for housing and Table 3.1 sets an annual target of 2,349 new homes for Barnet in the period 2015-2025. The application proposes a total of 1,200 residential units, representing 51% of the borough's annual target with 376 in detail and 824 in outline. A housing schedule is provided in Tables 1 and 2 below.

unit type	number	% of detail
1 bed	69	18%
2 bed	243	65%
3 bed	64	17%
total	376	100.0

Table 1: detailed element housing schedule

unit type	number	% of outline
1 bed flat	120	15%
2 bed flat	450	55%
3 bed flat	159	19%
2 bed houses	32	4%
3 bed houses	63	7%
total	824	100.0

Table 2: outline element housing schedule

24 The proposed housing quantum would make a welcome contribution towards meeting London's housing need and is supported in line with London Plan Policy 3.3. However, the current mix of unit types in both the detailed and outline elements is deficient in the level of larger family units (3+ bedrooms) and this should be substantially increased or assessed by the Council against local need.

Affordable housing

25 London Plan Policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. In doing so each council should have regard to its own overall target for the amount of affordable housing provision and Barnet Core Strategy Policy CS4 seeks to achieve 40% of all housing as affordable. This target should take account of the requirements of London Plan Policy 3.11, which include the strategic target that 60% of new affordable housing should be for social rent or affordable rent and 40% for intermediate rent or sale.

26 The application proposes a total of 1,200 units, none of which would be affordable. The applicant states that the scheme cannot viably support any affordable units and a financial appraisal has been submitted in support of the application. The lack of any affordable housing contribution is difficult to understand and unacceptable given the 'windfall' nature of the site/change of use and the high density of the proposal. In the absence of any substantial alternative benefit to mitigate against such a low provision, represents a significant disadvantage of this large residential-led scheme.

27 The Council should appoint an independent consultant to verify this position and GLA officers require further discussions on this aspect of the scheme. A review mechanism should also be secured in the S106 agreement to potentially enable additional affordable housing to come forward in later phases of the scheme, as viability improves.

Housing choice

28 London Plan Policy 3.8, together with the Mayor's Housing SPG, seeks to promote housing choice and a balanced mix of unit sizes in new developments. London Plan Policy 3.11 establishes that strategic priority be afforded to the provision of affordable family homes. The proposal, as currently submitted, includes 286 family units, equating to just under 24% of overall housing provision. Given the surrounding suburban context, the low public transport accessibility of the site and the Barnet Local Plan priority for 3 and 4 bedroom homes, the provision of family units is very low and should also cater for larger unit sizes (3+ bedrooms). The Council should confirm whether the mix responds appropriately to local housing need and if necessary the applicant should amend the housing mix within the scheme, which given its very suburban family character is expected.

Density

29 The Mayor's Housing SPG makes it clear that the impact of mixed use developments can be underestimated when the density is calculated on the basis of the total site area. Paragraph 1.3.63 sets out a methodology for calculating net site area for vertically-mixed schemes. The outline element of the scheme is vertically stacked, with employment, retail and community uses located above residential. However the detailed element includes a school and sports facilities, so for the purposes of this calculation this area has been excluded from the site area and the floorspace excluded from the net density calculation.

30 Using the above methodology, GLA officers have calculated the overall scheme density to be 85 units per hectare and 280 habitable rooms per hectare. This exceeds the London Plan guidance range of 150 to 250 habitable rooms per hectare for suburban sites with a public transport accessibility level of 2, as set out in London Plan Policy 3.4. During pre-application discussions, GLA officers noted that between 800 to 1000 units would be appropriate for this site. In this context, the applicant should look to address concerns regarding the very low provision of family units and the matters raised later in this report relating to design. It also is noted that the Mayor's supplementary planning guidance 'Housing' makes it clear that high density proposals need to be of the highest design quality, amenity and contribute to local place making. These matters are addressed in the following sections.

Housing quality and amenity

31 London Plan Policy 3.5 promotes quality in new housing provision, with further guidance provided by the Mayor's Housing SPG. The majority of units would comply with the minimum internal space standards and external amenity space standards set out in the London Plan, although there are a small number of units in the detailed element that are currently undersized. The applicant should amend the scheme to ensure that all units meet the minimum standards.

32 Key factors such as floor-to-ceiling heights, orientation, maximising ground floor individual access points, and number of units per core, are all essential to achieving high residential quality and are also of particular importance when assessing residential quality. It is clear from the submitted documentation for the detailed element that the residential layouts have generally been designed to ensure that the standard of accommodation will be high.

33 However, there are concerns over how the control documents for the outline element of the scheme would ensure that the design principles set out in the Mayor's Housing SPG would be carried through into the future reserved matters submissions. The applicant should revise the Design Principles Document to include reference to floor to ceiling heights, corridor widths, unit sizes, amenity space, proportion of dual aspect units and core to unit ratios. The applicant has indicated through discussions with GLA officers that these matters will be addressed, which is welcomed.

Children's play space

34 London Plan Policy 3.6 seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance, including a benchmark requirement for 10 sq.m. of play space per child. Given the scale of the scheme and the proposed public open space, it is expected that the play space requirements will be met on site.

35 Based on the child yield methodology set out in this SPG, GLA officers have calculated that Phase 1 of the development (the detailed element) will be home to 48 children, 29 of which are expected to be under five years old. The application proposes a neighbourhood area of play within the park to be provided as part of this phase, which would have an area of 450 sq.m. Doorstep play spaces for younger children would also be provided within the private courtyard spaces. Overall, the amount of play space provided for the detailed element of the scheme is expected to exceed London Plan standards, although this calculation may need to be adjusted once the agreed mix of affordable tenures are known, given the requirement to substantially increase the provision of family housing.

36 For the outline element, there would be 135 children, 83 of which would be under five. The application proposes further play space in the parks to be laid out as part of the outline element of the scheme, although the quantum of space is not specified in the application documentation. The applicant should ensure that the Design Principles Document or parameter plans incorporate minimum play space areas for the outline phases and explain how these address the requirements of the London Plan and Mayor's SPG standards.

37 The Council should impose conditions requiring the details of play space to be approved for both the outline and detailed elements of the scheme.

Urban design

38 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within chapter seven which address both general design principles and specific design issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London. It should be noted that the site and surrounding area are very suburban low density in character and this is a precursor to the form of new development proposed.

Layout and public realm

39 The application proposes a formal block structure, with a network of hierarchical streets defining a mix of building types and public open spaces. The scheme would create a permeable and legible network of public routes through the site, linking Oakleigh Road South with Brunswick Park Road and also connecting up with Weirdale Avenue in the north, which is welcomed. More than 2.9 hectares of open space would be created and all of this would be publically accessible, which is supported. Following pre-application discussions, amendments have been made to the scheme layout to introduce more lower rise housing typologies in the northern part of the site where ground levels are higher. This is a welcome amendment and GLA officers consider that the scheme responds well to the significant level changes across the site, generally accommodating the larger blocks in the centre of the masterplan and away from surrounding two storey housing. Overall therefore, the proposed masterplan layout is considered to be an appropriate design response to its site and suburban character and the attention to detail given to the design quality and landscaping of the streets and open spaces is both critical and welcomed.

40 There are however detailed concerns over the way the proposed buildings will address the streets and open spaces within the scheme. In particular there are very few individual residential entrances serving the ground floor apartments. It is acknowledged that the site level differences

present a challenge, but the applicant should look to increase the number of individual ground floor entrances to residential units to increase animation to the street network. Furthermore, the end of terrace houses proposed should be bespoke house types with active flank elevations, to fully address the return frontage with entrance doors and windows to minimise dead frontage. The applicant should address these matters as part of the detailed element of the scheme, as well as including controls within the Design Principles Document to ensure that the outline element comes forward in a similar way. An absolute minimum proportion of dead frontage for non-residential uses should also be achieved.

41 As mentioned, the location of the school on the Brunswick Park Road frontage of the masterplan would increase its visibility and prominence in the community, which is supported. However, the extensive retaining wall proposed along the site frontage would create a long stretch of dead frontage along Brunswick Park Road and would not maximise the opportunity for passive surveillance of the public realm. This would not be in keeping with the suburban character of the streetscape. The applicant should reconsider the frontage design in this area, by reducing or removing the high retaining wall and re-designing/re-orientating the access ramp to reduce its visual impact. It is noted that the applicant has begun work on amendments to address this aspect, as well as other matters raised in this section, which is necessary and welcomed.

Residential quality

42 As mentioned above, the quality of the residential accommodation proposed is generally considered to be high, with the majority of blocks meeting the Mayor's London Plan and Housing SPG standards and London Plan guidance for floor-to-ceiling heights, dual aspect, orientation and number of units per core. However, as mentioned there are a number of units in Blocks 1C and 1D that fall short of the Mayor's internal space standards. The applicant is therefore required to review the proposed floor plans and ensure that all units are compliant. In addition, as mentioned the applicant should include controls in the Development Principles Document to ensure that future reserved matters submissions comply with the relevant requirements.

Scale, height and massing

43 As mentioned above, the scheme proposes a varied scale across the site, responding to the levels changes and existing suburban boundary conditions. The scheme would not impact on any strategic views identified in the Mayor's London View Management Framework SPG and the applicant's Townscape and Visual Impact Assessment demonstrates that there would be no harm to heritage assets. As discussed at pre-application stage, the scale of the majority of buildings at 5-8 storeys located towards the centre of the site and replacing existing large buildings is considered to be an appropriate response. However, as mentioned above, the way the buildings interact with the public realm will need to be improved.

44 The applicant has reduced the scale of development around the majority of the boundary to 3 storey terraced houses in response to GLA officer's suggestions during pre-application discussions. However, the exception to this is blocks 1E, 1F and part of 1D where large scale blocks project close to nearby two storey housing. The applicant should reduce the scale of the rear wings of 1E and 1F to no more than 3 storeys and similarly reduce the element of 1D backing onto Howard Close. These amendments combined with changes required to the unit mix mentioned above should get the overall unit numbers close to that suggested at pre-application stage.

45 The proposed tall buildings at up to eleven storeys would be significantly taller than the surrounding context and the existing buildings on the site. The nature of the height of the tall buildings was discussed at pre-application meeting, particularly given the primarily suburban location. The proposed building heights of these taller elements and their visual impact will

therefore need to be fully justified in terms of how they appear in the context of the surrounding suburban area.

Architectural treatment

46 The scheme proposes a simple contemporary architectural approach, utilising predominantly brick facade treatments with horizontal banding, deep window and balcony reveals and contrasting materials for the upper floors of the larger blocks. The restrained architectural treatment is supported and should ensure a high quality robust finish across the scheme, with variety coming from subtle changes in materials across the character areas identified in the Development Principles, such as brick tones. The proposed school buildings would be constructed of similar materials and would incorporate sufficient detailing so as to break up the 'super block' nature of the design.

47 The overall architectural approach is therefore supported, however materials and the quality of detailing will have a significant impact on overall quality in the completed scheme. The Council is therefore strongly encouraged to secure the retention of the architects during the detailed design stage for Phase 1, in addition to utilising appropriate conditions securing design detail and materials.

Flooding

48 The site is within Flood Zone 1 and has no significant risk of surface water flooding. Therefore the proposals are acceptable in principle in relation to London Plan Policy 5.12. The Flood Risk Assessment states that the proposals will achieve greenfield runoff rates for surface water discharge using SUDS techniques. The Council should impose a condition requiring details of a phased surface water drainage scheme to be submitted, approved and implemented.

Inclusive design

49 In accordance with London Plan Policy 3.8, the applicant has confirmed that all of the residential units will meet accessible and adaptable standards (building regulation M4 (2)), and that 10% of the units will be designed to be fully adaptable and adjustable to wheelchair users (building regulation M4 (3)). For the detailed element of the scheme, the drawings demonstrate that these units are appropriately split between blocks, floors and unit sizes. As set out in the Mayor's Housing Standards Policy Transition Statement, the Council should secure compliance with building regulations M4 (2) and M4 (3) by condition, both in the detailed and outline elements. Considerable work has been done to address the levels changes on the site and all of the non-residential uses and public realm would be fully accessible, which is supported.

50 There are 60 blue badge spaces proposed at basement level of the detailed element (Phase 1), which would exceed the 10% requirement. The blue badges would be located close to the core entrances within the basement parking areas. The Council should secure a car parking management plan by condition, to include measures to ensure that these spaces are assigned to occupiers of the accessible residential units.

Climate change - adaptation

51 The proposal includes a number of measures in response to strategic policies regarding climate change adaptation, which are welcomed. Measures proposed include high level insulation and air tightness, solar shading, low energy lighting and energy efficient appliances, low water use sanitary-ware and fittings and green roofs. The Council should impose conditions to ensure that these measures are implemented as part of the development.

Climate change - mitigation

Energy efficiency

52 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting. However, information needs to be provided on how the design has been developed in line with the cooling hierarchy given in policy 5.9 in order to minimise cooling demand for the non-domestic elements and the overheating risk for the residential dwellings. Dynamic overheating modelling in line with CIBSE Guidance TM52 and TM49 is recommended.

53 The applicant should provide the carbon emissions and savings at each step of the energy hierarchy in line with GLA Guidance (<https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>).

54 The applicant should also demonstrate that enough efficiency measures have been integrated to meet Part L 2013 by efficiency alone (i.e. excluding low zero carbon and renewable technologies). Sample SAP calculation worksheets (both DER and TER sheets) and BRUKL sheets including efficiency measures alone should be provided to support the savings claimed.

District heating and renewables

55 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. However, the applicant has identified that the Brunswick Park is noted as an area for consideration in the Barnet Heat Mapping Study. The applicant states that the study concludes the area is not considered to be a focus for district heating due to the lack of heat loads but could warrant its own CHP scheme with potential linking to a future district heating network. Given that the scheme is a large-scale development (greater than 1,000 homes) and could therefore be a potential catalyst for an area wide network the applicant should contact borough's energy officer to discuss the feasibility of including additional space within the energy centre and capacity within the site heat network to supply heat to nearby developments and, where applicable, existing buildings. Evidence of correspondence should be provided.

56 The applicant is proposing to install block based communal heating systems rather than a site wide heat network due to heat losses and security of supply concerns. Given the large scale of the development and the lack of analysis this approach is not currently supported. The applicant is required to further investigate the suitability of a site wide heat network connecting all buildings from a single energy centre. The analysis should be based on suitable monthly demand profiles for domestic hot water and space heating for the site as a whole, estimation of pipe length and solutions for security of supply. The heat network should also be designed to allow for future connection to a district heating network should one become available. The applicant should review Section 10 of the GLA energy assessment guidance for site wide heat network assessment requirements.

57 The applicant has investigated the feasibility of CHP. However, the applicant is not proposing CHP due to the intermittent low space heating demand, diversity of residential dwellings, pipe losses and cost of connection. This approach is not accepted as the applicant has not provided an analysis to support the claims made. In addition, it is considered that a development with greater than 1,000 dwellings will have a significant hot water demand and certain level of diversity which, in conjunction with a large thermal store, could potentially result in a high proportion of heat from CHP. The applicant is therefore required to further investigate the suitability of CHP in detail, including carbon emission savings, the size of the engine proposed (kW_e/kW_{th}) and the provision of any thermal store based on suitable monthly demand profiles for heating and electrical loads. The plant efficiencies used when

modelling carbon savings should be the gross values rather than the net values often provided by manufacturers. The applicant should also provide a cost benefit analysis and a whole life cost (WLC) analysis comparing the communal and individual systems, in line with Appendix 2 of the GLA energy assessment guidance document.

58 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install Photovoltaic (PV) panels on the roof of the development. The applicant anticipates that between 0.75 to 1 kWp will be required for each dwelling in order to meet the carbon emission target. The applicant should provide the total PV requirement (in kWp and sq.m.) for the scheme, including the non-domestic elements of the scheme. A roof layout drawing should be provided to demonstrate that there is sufficient capacity to accommodate the proposed PV systems.

Summary

59 Based on the energy assessment submitted at Stage 1, a saving of 35% in regulated emissions compared to a 2013 Building Regulations compliant development is expected. However, carbon emissions and savings at each step of the energy hierarchy have not been provided so compliance with Policy 5.2 cannot be verified. The applicant should address the comments above and provide further details in line with GLA Guidance on preparing energy assessments (current version: April 2015) before compliance with London Plan energy policy can be verified.

Transport

Parking

60 Residential car parking for the detailed phase is at a ratio of 1.4 spaces/per dwelling overall, with a higher ratio for larger units. On that basis 530 spaces are proposed for the 376 units in this phase. TfL considers the parking levels to be excessive. For urban and suburban developments in areas of moderate PTAL, parking provision of 1.5 per unit is the maximum so the applicant is requested to reduce the level of car parking throughout the scheme. Given the scale of the development strong travel plan measures can be implemented, such as a car club, reducing the need for second cars. Given the school and overall quantum of development, the Council should also consider reviewing local parking controls to ensure compliance with London Plan Policy 6.3.

61 TfL expects for the overall development, that each wheelchair accessible unit be allocated a Blue Badge parking space. This should be located close to residential cores or building entrances. Therefore a minimum of 37 Blue Badge bays should be provided for the residential use in the detailed phase. In addition, the applicant should ensure that 20% of all spaces have Electric Vehicle Charge Points (EVCP) as well as passive provision for a further 20%.

62 TfL expects that any restraint applied to the parking ratio for the detailed phase should be reflected in the outline element of the scheme. This would therefore mean that a maximum of 1,015 spaces should be provided. The take up of parking in the detailed phase should be monitored and any underused spaces could be carried forward towards any future allocation for the outline proposals. The provision of EVCPs and Blue Badge parking to be provided in line with London Plan policy should be secured by the Council through a planning condition.

63 School parking is proposed at a ratio of 1:1 for staff, located in the basement car park with a further 22 spaces for visitors and disabled users. TfL recommend a maximum provision of 65 spaces provided for staff, reflecting a ratio of 0.7. Lowering the ratio would reflect London Plan principles and encourage car share and other more sustainable transport modes. Furthermore, staff parking should provide for at least 2 disabled spaces, as should visitor parking. EVCP provision should also reflect London Plan standards (20% active and passive).

Access

64 A pedestrian and cycle link running north-south through the site is proposed, connecting along Ashbourne Avenue with Oakleigh Road South. This would improve permeability as well as encouraging sustainable travel and is supported by TfL. However, the applicant should improve cycle facilities on all approaches to the site by reviewing the condition of those routes and suggesting improvements that Barnet Council could secure through Section 106 agreement. TfL requests that the applicant undertake an area wide Pedestrian Environment Review Systems (PERS) audit to identify any necessary improvements that should also be secured through the Section 106 agreement.

Trip generation

65 TfL is concerned that the residential person trip rates should be comparable to other sites in outer London and Barnet in particular, and the mode split assessment may have under represented bus use. Given the high ratio of proposed car parking, this is likely to create high car dependency for school staff, pupils and residents. The Transport Assessment (TA) indicates that a school Travel Plan will be prepared but no mode share shift targets are indicated.

66 The TA does not assess impact on the TLRN or SRN - TfL requests this is assessed. The TA assesses the junctions onto the approaches to the TLRN, so an initial assessment could be provided and TfL can then confirm what further modelling is needed.

Cycling

67 Cycle parking for the detailed phase is proposed in accordance with London Plan standards which TfL welcomes. The Council should secure the details of the type of cycle stand to be provided by condition to include 5% of spaces for larger, specialised cycles and the number and location of short-stay visitor parking.

68 School cycle parking should also be provided in accordance with London Plan standards: 1 long-stay space per 8 staff and 1 space per 8 students with a further 1 space per 100 students for short-stay provision. Shower and change facilities for employees should also be provided. Similarly, the quantum, location and design of cycle storage for the outline phase should be secured by condition and comply with prevailing London Plan and London Cycle Design Standards.

Buses

69 Given the distance to the nearest station, TfL assumes that all rail/tube trips begin with a bus journey. This should be considered in the multi-modal trip generation assessment. On that basis, TfL requests mitigation towards one return AM journey and one single PM journey, with a cost of £165,000 per annum to provide (or £825,000 over five years). This should be secured through the Section 106 agreement.

70 In addition, all local bus stops should be audited within the scope of the PERS assessment referred to above in accordance with TfL Streets Toolkit and Bus Stop Accessibility guidance. Barnet Council should secure bus stop upgrades where necessary.

Freight

71 Considering the scale of the development TfL would expect that the applicant submits a framework construction logistics plan (CLP), and a framework delivery and servicing plan (DSP) in order to ensure freight activity is as efficient and effective as possible prior to determination. The framework freight plans should be provided as part of this application submission in order to ensure

that a full understanding of freight movements is available for consideration before Barnet Council determine the application.

Travel planning

72 The applicant has provided a framework Travel Plan which is welcomed. The Travel Plan reflects strategic transport policies set out in the London Plan and other guidance, but the applicant needs to confirm to TfL the degree of mode shift they are aiming to achieve.

Community Infrastructure Levy

73 In accordance with London Plan policy 8.3, *Community Infrastructure Levy*, the Mayor commenced CIL charging for developments permitted on or after 1 April 2012. The relevant Mayoral charge for the borough of Barnet is £35 per square metre Gross Internal Area (GIA).

Summary

74 In summary, the applicant should reduce car parking provision and provide cycle parking for the school in line with London Plan standards, as well as providing shower and changing facilities as part of the non-residential uses. Further analysis of the impact on the TLRN, SRN and bus capacity should be undertaken as part of the TA. Framework construction logistics plans and delivery and servicing plans should be provided for TfL consideration, whilst car parking management and details of cycle parking should be secured by condition. A Section 106 agreement should be entered into to secure an £825,000 contribution towards local buses, travel planning, bus stop and other pedestrian/cycle improvements following a PERS audit.

Local planning authority's position

75 The Council is currently considering the application and is not targeting a specific committee at this time.

Legal considerations

76 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

77 There are no financial considerations at this stage.

Conclusion

78 London Plan policies on employment, education, housing, urban design, inclusive design, climate change, and transport are relevant to this application. The principle of the residential-led

mixed-use redevelopment of this site is supported. However, a number of strategic concerns are raised, and consequently the application does not accord with London Plan Policy:

- **Employment and education:** whilst the current London Plan identifies the site as SIL, it is accepted that this function is increasingly becoming obsolete and will be less viable in the future. The Council should secure the delivery of the replacement employment space, including controls over terms and rent levels for SMEs, through the S106 agreement and ensure that the requirement for primary school places is mitigated, to satisfy London Plan Policies 2.17 and 3.18.
- **Housing:** the quantum proposed is high for a suburban context. The absence of any affordable housing is unacceptable for this scale of development and the proposal therefore does not comply with London Plan Policy 3.12. The applicant should also address concerns raised with regard to the housing mix, to increase the delivery of family housing, and residential quality.
- **Urban design:** the density, height and scale in a predominantly suburban area are challenging. However, the applicant should seek to address concerns relating to residential quality, layout and visual impact, to ensure compliance with London Plan Policies 3.5 and 7.3.
- **Climate change mitigation:** the energy strategy does not accord with London Plan policies 5.2, 5.6 and 5.9. The applicant's position on district heating, site wide heat network and CHP is not supported and further justification is required. Further information is also required regarding overheating and PV siting.
- **Transport:** to ensure compliance with London Plan policies 6.1, 6.2, 6.3, 6.4, 6.7, 6.9, 6.10, 6.12 and 6.13 the applicant should reduce car parking provision and provide cycle parking for the school in line with London Plan standards, as well as providing shower and changing facilities as part of the non-residential uses. Further analysis of the impact on the TLRN, SRN and bus capacity should be undertaken as part of the TA. Framework construction logistics plans and delivery and servicing plans should be provided for TfL consideration, whilst car parking management and details of cycle parking should be secured by condition. A Section 106 agreement should be entered into to secure an £825,000 contribution towards local buses, travel planning, bus stop and other pedestrian/cycle improvements following a PERS audit.

for further information, contact GLA Planning Unit (Development & Projects team):

Stewart Murray, Assistant Director – Planning

020 7983 4271 email stewart.murray@london.gov.uk

Colin Wilson, Senior Manager – Development & Projects

020 7983 4783 email colin.wilson@london.gov.uk

Nick Ray, Senior Strategic Planner, case officer

020 7983 4178 email nick.ray@london.gov.uk
