

Appendix 2 – Analysis of Scheme Compliance with Regional and Local Planning Policy

Table 2.1: Analysis of the proposals compliance with London Plan (March 2015) Policies

Policy	Content Summary	Extent of compliance and comment
Policy 1.1 (Delivering the strategic vision and objectives for London)	Strategic vision and objectives for London including managing growth and change in order to realise sustainable development and ensuring all Londoners are able to enjoy a good and improving quality of life.	Compliant: As a London Plan Opportunity Area, the approved BXC scheme seeks to make the most of brownfield land to meet wider growth requirements in terms of housing, retail and commercial activities in a location accessible by a range of transport modes. The RMA proposals for Plots 53 and 54 are considered to constitute sustainable development in accordance with the parameters and other relevant development plan policies.
Policy 2.6 (Outer London: vision and strategy);	Work to realise the full potential of outer London and enhance the quality of life for present and future residents.	Compliant: The BXC Opportunity Area represents a significantly underutilised area of accessible brownfield land in Outer London in need of regeneration. It is considered that the proposals for Plots 53 and 54 respect the setting and character of their surroundings whilst maximising the development potential of the land. The proposals include the creation of new homes which meet the requirements of development plan policy.
Policy 2.13 (Opportunity Areas and Intensification Areas)	Seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses Contribute towards meeting (or where appropriate, exceeding) the minimum guidelines for housing. Support wider regeneration and integrate development proposals to the surrounding areas especially for regeneration.	Compliant: It is considered that the proposals for Plots 53 and 54 optimise the development potential of the land. The proposal has a density of 236 habitable rooms per hectare which is below the indicative density of 298 habitable rooms per hectare established for the Brent Terrace Zone set out in table 3B of the revised DSF. The proposed development meets and achieves amenity space standards for future residents as specified in the Design and Access Statement for the S73 Consent and is higher than London Plan amenity space standards, and meets or exceeds the London Plan internal space standards. The submitted plans demonstrate that all flats and houses meet these minimum standards with many exceeding them. The individual dimensions and room sizes within the flats comply with the standards set out in Annex 1 of the London Housing SPG. The units proposed will allow the decant of the Whitefields Estate Residents and will therefore support the wider regeneration. Phase 1A (North) of the BXC development includes highways infrastructure, River Brent re-routeing and Bridge works, Clitterhouse Playing Fields Part 1 (excluding the Nature Park) and the Claremont Park Improvements and the Living Bridge. The proposed development will therefore be well integrated with the surrounding area.

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<p>Policy 2.14 (Areas for regeneration)</p>	<p>Boroughs should identify spatial areas for regeneration and spatial policies to bring together regeneration.</p> <p>The loss of housing, including affordable housing should be resisted in individual regeneration areas unless it is replaced by better quality accommodation, providing at least an equivalent floorspace.</p>	<p>Compliant: The wider BXC site is identified as a London Plan Opportunity Area in need of comprehensive regeneration and capable of accommodating significant housing, jobs and community infrastructure. Outline planning consent is in place as per reference F/04687/13.</p> <p>It is considered that the proposal achieves the relevant strategic requirements of this policy. 31 of the 47 units proposed are to be social rented affordable housing with 15 units for existing leaseholder and freeholders to allow the decant of Whitefields Estate Residents in accordance with the latest survey of housing need.</p>
<p>Policy 2.18 (Green infrastructure: the multi-functional network of green and open spaces)</p>	<p>Development proposals should protect, promote, expand and manage the extent and quality of, and access to, London's network of green infrastructure</p>	<p>Compliant: The wider BXC development will deliver a range of green infrastructure, including enhancements to existing open spaces and the creation of new open spaces, an increase of approximately 9 hectares of open space net including natural areas. A network of cycle and pedestrian routes will be provided which will link areas of open space.</p> <p>Improvements will be made to Clitterhouse Playing Fields and Claremont Park as part of Phase 1A (North) which will be easily accessible to future residents of Plots 53 and 54.</p>
<p>Policy 3.1 (Ensuring equal life chances for all)</p>	<p>Development proposals should protect and enhance facilities and services that meet the needs of particular groups and communities. Proposals involving loss of these facilities without adequate justification or provision for replacement should be resisted.</p>	<p>Compliant: The impact of the wider BXC development on existing social infrastructure provision was appropriately considered and approved under the Outline and S73 applications. The proposed provision has been considered to be adequate to meet forecasted need in accordance with this policy. Plots 53 and 54 are currently used by local residents as informal open space. The loss of this green space to development has been established within both the 2010 and 2014 outline permissions and has been found to be acceptable due to the overall increase in open space within the Brent Cross Development in its end state and more immediately by the improvements to Claremont Open Space and Clitterhouse Playing fields in Phase 1A (North).</p>
<p>Policy 3.2 (Improving health and addressing health inequalities)</p>	<p>New developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles.</p>	<p>Compliant: The RMA proposals are found to be compliant with the objectives of this policy.</p> <p>It is considered that the proposed buildings will represent an improvement in the quality of building design and environment. Plots 53 and 54 form part of the wider BXC development which will make improvements in public realm, provision of new community facilities, such as a new primary school, a secondary and special needs school upgrade and a new primary health centre. Provision of new open space and play areas such as the improvements to Clitterhouse Playing Fields (Part 1 excluding Nature</p>

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		Park) and Claremont Park, will also provide opportunities for higher levels of physical activity in accordance with policy requirements.
Policy 3.3 (Increasing housing supply)	Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target. For Barnet the target is 23, 489 over the next 10 years with an annual monitoring target of 2,349.	Compliant: This RMA application will deliver 47 housing units contributing towards strategic housing targets for Barnet and London.
Policy 3.4 (Optimising housing potential)	Development should optimise housing output for different types of location taking into account local context and character, the London Plan design principles and public transport capacity. Proposals which compromise this policy should be resisted.	Compliant: The proposal has a density of 236 habitable rooms per hectare which is below the indicative density of 298 habitable rooms per hectare established for the Brent Terrace Zone set out in table 3B of the revised DSF. The scheme is considered to comply with the objective of this policy and is found to provide an optimum density of development. The proposal puts forward an acceptable design response which complies with the relevant development plan policies, responds acceptably to the local context and character and takes account of the sites location.
Policy 3.5 (Quality and design of housing developments)	<p>Housing developments should be of the highest quality internally, externally and in relation to their context and wider environment, taking account of the policies in the London Plan.</p> <p>The design of all new housing should incorporate the London Plan minimum space standards and enhance the quality of local places, taking account of physical context, local character, density, tenure and land use mix and relationships with and provision of spaces.</p>	Compliant: The development will maximise the potential of the site in accordance with this policy creating a quality environment that meets the relevant standards. The proposed development meets and achieves amenity space standards for future residents as specified in the Design and Access Statement for the S73 Consent and is higher than London Plan amenity space standards. The submitted plans demonstrate that all flats and houses meet the London Plan minimum internal space standards with many exceeding them. The individual dimensions and room sizes within the flats comply with the standards set out in Annex 1 of the London Housing SPG.
Policy 3.6 (Children and young people's play and informal recreation facilities)	New housing should make provision for play and informal recreation based on the child population generated by the scheme and an assessment of future needs.	<p>Compliant: Plot 53 falls within 100m of the proposed Claremont Park which includes play areas and open space facilities. This distance is in line with the London Plan Play Space Requirements and therefore no separate play provision is required on the northernmost plot.</p> <p>Plot 54 is in excess of 100m from the proposed Claremont Park but is less than 400m from Claremont Park. In order to comply with the Mayor's standards the scheme includes 180m² of doorstep play space within the area of Plot 54. The application is considered to meet the objectives of this policy.</p>

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3.8 (Housing choice)	<p>Londoners should have a genuine choice of homes that they can afford and which meet their requirements, inter alia:</p> <ul style="list-style-type: none"> • New developments should offer a range of housing sizes and types. • All new housing should be built to Lifetime Homes standard. • 10% of new housing is designed to be wheelchair accessible, or easily adaptable for wheelchair users. 	<p>Compliant: 31 of the 47 units proposed are to be social rented affordable housing with 15 units for existing leaseholder and freeholders to allow the decant of Whitefields Estate Residents in accordance with the latest survey of housing need. The specific housing mix has been directly informed by an assessment of the housing need of the Existing Whitefield Estate Residents (Part 1) and has resulted in larger units being provided which is a deviation from the unit mix indicated in the S73 Consent.</p> <p>In accordance with Appendix 6 of the DSF of the S73 Consent, all units will achieve Lifetime Homes standards.</p> <p>Three wheelchair adaptable units are proposed within Plots 53 and 54 which equates to 6.4% of the proposed units. This exceeds the housing need identified for the Whitefield Estate residents but is below the site wide target of 10% specified in the S73 Consent. The minor shortfall can be made up across future development plots. The proposal is considered acceptable in this instance on the basis that the housing mix proposed is specifically designed to meet the housing need of the Whitefield Estate Residents.</p>
<p>Policy 3.9 (Mixed and Balanced Communities);</p> <p>Policy 3.10 (Definition of Affordable Housing)</p> <p>Policy 3.11 (Affordable Housing Targets)</p> <p>Policy 3.12 (Negotiating affordable housing on individual private residential and mixed use</p>	<p>Communities mixed and balanced by tenure and household income should be promoted across London. They must be supported by effective and attractive design and enhanced environment</p> <p>Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. Seek to maximise affordable housing provision and ensure an average of at least 17,000 more affordable homes per year in London. In order to give impetus to a strong and diverse intermediate housing sector, 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or scale. Priority should be accorded to provision of affordable family housing.</p> <p>Negotiations should take account of a site's specific individual circumstances, including viability, the availability of subsidy, requirements and targets for affordable housing, the need to promote mixed and balanced communities and the need to encourage residential</p>	<p>Compliant: 31 of the 47 units proposed are to be social rented affordable housing with 15 units for existing leaseholder and freeholders to allow the decant of Whitefields Estate Residents in accordance with the latest survey of housing need. This is needed to ensure that land in the rest of Phase 1A (North) can be released to allow necessary infrastructure to be delivered.</p> <p>The proposals are considered to be high quality design creating a quality environment that meets the relevant standards.</p> <p>The scheme is considered to be compliant with policies on the creation of mixed and socially balanced communities.</p>

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schemes); Policy 3.13 (Affordable housing thresholds)	development. Boroughs should normally require affordable housing provision a site which has capacity to provide 10 or more homes.	
Policy 3.14 (Existing housing)	Loss of housing, including affordable housing, should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace.	Compliant: The S73 Consent will provide replacement homes for all homes currently situated the wider BXC site which are to be demolished as part of the proposals. This RMA application will provide 31 social rented homes for secure tenants and 15 homes for existing resident leaseholders/freeholders in the Whitefield Estate. This will allow the decant of the Whitefield Estate Residents (Part 1). Whilst this represents a reduction in number of units, the same quantum of floorspace is being provided. This is a direct result of the housing needs assessment which identified that larger units were required for the Whitefield Estate Residents. The proposed re-provision is considered to be acceptable on this basis.
Policy 3.19 (Sports Facilities)-	Development proposals that increase or enhance the provision of sports and recreation facilities will be supported. Proposals that result in a net loss of sports and recreation facilities, including playing fields should be resisted. Facilities should be accessible to all sections of the community and be located within easy reach by walking, cycling and public transport.	Compliant: Plots 53 and 54 are currently used by local residents as informal open space. The loss of this green space to development has been established within both the 2010 and 2014 outline permissions and has been found to be acceptable due to the overall increase in open space within the wider BXC Development in its end state and more immediately by the improvements to Claremont Open Space and Clitterhouse Playing fields in Phase 1A (North).
Policy 5.1 (Climate change mitigation); Policy 5.2 (Minimising carbon dioxide emissions);	Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy. The Mayor will seek to ensure that developments meet the following target for CO ₂ emissions, which is expressed as year improvements on the 2013 Building Regulations: 2013-2016 40%	Compliant: The wider BXC development includes a range of climate change mitigation measures based on the Energy and Sustainability Strategies which have informed the Outline application. The proposed development is required by condition 35.6 of the S73 Consent to comply with the approved revised energy strategy. The performance standards of the buildings on-site will be maximised in order to reduce carbon dioxide emissions from the Scheme. A condition is recommended to this reserved matters application for compliance to be demonstrated. The development is considered to be in accordance with this policy.
Policy 5.3 (Sustainable design and construction)	Development proposals should demonstrate that sustainable design standards are integral to the proposal, considered from the start of the process and meet the requirements of the relevant guidance.	Compliant: It is considered that the development will be designed to maximise the use of land close to existing public transport and planned new transport investment. The proposed buildings are designed to achieve Code for Sustainable Homes Level 4 and achieve

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		carbon savings in accordance with the relevant London Plan target.
Policy 5.6 (Decentralised energy in development proposals)	<p>Development should evaluate the feasibility of combined heat and power (CHP) systems and where they are appropriate also examine the opportunities to extend the system beyond the site boundary.</p> <p>Energy systems should be selected in the following hierarchy, connection to existing heating or cooling networks; site wide CHP network; communal heating and cooling.</p>	<p>Compliant: The wider BXC planning permission includes provision for CHP(s). There will be a phased approach to the provision of this network with the potential to connect all plots – with the possible exception of those at the southern extremity of the development – as future phases are brought forward.</p> <p>The scheme has been designed and there is commitment to link Plots 53 and 54 with the wider District Heating Network (subject to agreement with the Registered Provider and feasibility).</p>
Policy 5.7 (Renewable energy); Policy 5.9 (Overheating and cooling)	<p>Within the framework of the energy hierarchy proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation where feasible.</p> <p>Proposals should reduce potential overheating and reliance on air conditioning systems and demonstrate this has been achieved.</p>	<p>Compliant: The proposed development has been designed with a combined heat and power (CHP) plant on sitewhich will provide heat through a district heating network to the proposed units.</p> <p>This will fully comply with this policy to reduce carbon dioxide levels. Should the CHP not be feasible then alternative renewable energy solutions will be explored for these plots to achieve the necessary reduction in carbon dioxide emissions.</p>
Policy 5.10 (Urban greening); Policy 5.11 (Green roofs and development site environs)	<p>Development proposals should integrate green infrastructure from the beginning of the design process to contribute to urban greening, including the public realm. Elements that can contribute to this include tree planting, green roofs and soft landscaping</p> <p>Proposals should be designed to include roof, wall and site planting to deliver as wide a range of the objectives associated with such planting as possible.</p>	<p>Compliant: The proposed development incorporates several areas of new soft landscaping on the site. Details of these would be controlled through the conditions recommended to ensure that they achieve as many of the objectives of this policy as are practical. Improvements to the ecological value of the existing site are proposed. The current site includes low quality amenity grassland with intermittent tree and scrub planting. The proposals create new opportunities for local wildlife on the site as part of a green corridor within the local area including: use of predominantly native replanting including fruit and flower trees; retained and replanted hedging to the western boundary; provision of a tiered woodland/hedge habitat to the eastern boundary; and the inclusion of green roofs.</p>
Policy 5.12 (Flood risk management); Policy 5.13 (Sustainable drainage)	<p>Proposals must comply with the flood risk assessment and management requirements of set out in the NPPF and supporting Technical Guidance.</p> <p>Proposals should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so and should aim to achieve Greenfield runoff rates and ensure that surface water runoff is managed as close to its source as possible. Drainage should be designed and implemented in ways that deliver other objectives of the London</p>	<p>Compliant: The wider BXC development proposals have been based on a comprehensive flood risk assessment that has been accepted by the Environment Agency. It is considered that the application complies with this policy.</p> <p>The wider development includes 25% reduction in surface water runoff against the current 1:100 year return flow plus 30% for climate change. A range of sustainable urban drainage systems are proposed as part of the SUDS strategy to be submitted and approved under conditions 1.27 and 44.5.</p>

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<p>Policy 5.14 (Water quality and wastewater infrastructure)</p> <p>Policy 5.15 (Water use and supplies)</p>	<p>Proposals must ensure that adequate waste water infrastructure capacity is available in tandem with development.</p> <p>Development should minimise the use of mains water and conserve water resources.</p>	<p>Compliant: The development will comply with all relevant criteria.</p> <p>A 105 litres per day water use target will be sought for residential buildings in accordance with condition 33.2. Commitments have been made for rain water harvesting and promoting the use of grey water recycling.</p>
<p>Policy 5.17 (Waste capacity)</p>	<p>Suitable waste and recycling facilities are required in all new development.</p> <p>Minimising waste and achieving high reuse and recycling performance</p>	<p>Compliant: Conditions have been recommended which require the provision of suitable waste and recycling facilities for the proposed units.</p>
<p>Policy 6.3 (Assessing effects of development on transport capacity)</p>	<p>Development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. Development should not adversely affect safety on the transport network.</p>	<p>Compliant: The Phase 1 Phase Transport Report has been submitted under Condition 37.2. This covers the entire Phase 1 area north and south of the A406 which extends to circa 370,000sqm of development floorspace which includes 1,840 residential units.</p> <p>The 47 units proposed on Plots 53 and 54 represent a very small component of the development floorspace considered, and represent a replacement of existing premises in the Whitefield Residential Estate rather than additional homes within the regeneration area.</p>
<p>Policy 6.9 (Cycling);</p> <p>Policy 6.10 (Walking)</p>	<p>Proposals should provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards and the guidance set out in the London Cycle Design Standards (or subsequent revisions).</p> <p>Development proposals should ensure high quality pedestrian environments and emphasise the quality of the pedestrian and street space by referring to Transport for London's Pedestrian Design Guidance.</p>	<p>Compliant: Two areas of cycle parking will be provided within Plot 53 and one area of cycle parking will be provided for Plot 54. One cycle space will be provided for each two bedroom unit, and two for each three or four bedroom unit, resulting in a total provision of 73 cycle spaces.</p> <p>Officers consider that the scheme proposes a suitable quality of pedestrian environment and the proposal would provide appropriate levels of facilities for cycles and cyclists.</p>
<p>Policy 6.11 (Smoothing traffic flow and tackling congestion)</p>	<p>Take a coordinated approach to smoothing traffic flow and tackling congestion through implementation of the recommendations of the Roads Task Force report.</p>	<p>Compliant: The Phase 1 Phase Transport Report has been submitted under Condition 37.2. This covers the entire Phase 1 area north and south of the A406 which extends to circa 370,000sqm of development floorspace which includes 1,840 residential units.</p> <p>The 47 units proposed on Plots 53 and 54 represent a very small component of the development floorspace considered, and represent a replacement of existing premises in the Whitefield Residential Estate rather than additional homes within the regeneration area.</p>

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Policy 6.13 (Parking)	The maximum standards in the London Plan should be applied to planning applications and developments should also provide electrical charging points, parking for disabled people and cycle parking in accordance with the London Plan standards. Delivery and servicing needs should also be provided for.	Compliant: A total of 47 parking spaces will be provided across the two plots at a ratio of 1:1.. The main parking area provided for Plot 53 will allow vehicles (including servicing and emergency vehicles) to turn around. .
Policy 7.2 (Inclusive environment)	Design and Access Statements should explain how, the principles of inclusive design, including the specific needs of older and disabled people have been integrated into the proposed development, whether relevant best practice standards will be complied with and how inclusion will be maintained and managed.	Compliant: All of the units are designed to achieve Lifetime Home standards.6.4% of the units will be capable of adaptation to wheelchair standards.
Policy 7.3 (Designing out crime)	Development proposals should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating.	Compliant: The development incorporates the principles of “Secured by design” The Metropolitan Police Service and London Fire and Emergency Protection Authority have not expressed any concerns about the proposals.
Policy 7.4 (Local character); Policy 7.5 (Public realm); Policy 7.6 (Architecture)	Buildings, streets and spaces should provide a high quality design response. Public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context and incorporate the highest quality design, landscaping, planting, street furniture and surfaces. Architecture should make a positive contribution to a coherent public realm, incorporate the highest quality materials and design appropriate to its context.	Compliant: Officers consider that the proposed development provides an appropriate and quality design approach to the buildings and spaces which form part of the application. The proposal is considered to demonstrate the influence of these policies and compliance with their key objectives where they are relevant.
Policy 7.13 (Safety, security and resilience to emergency)	Proposals should contribute to the minimisation of potential physical risks and include measures to assist in designing out crime and terrorism.	Compliant: The development incorporates the principles of “Secured by design”. Car parking is provided within the site in areas with significant levels of overlooking providing a high degree of security for vehicle owners. The level of activity resulting from the development along with passive overlooking will improve security within publicly accessible open space to the north of plot 53 as well as to the pedestrian cut through to the south of plot 54. The submission is considered to accord with secure by design principles.
Policy 7.14 (Improving air quality)	Proposals should: - Minimise increased exposure to existing poor air quality and make provision to address	Compliant: The submission demonstrates that the proposal would not have a significant adverse impact on air quality and the impact of local air quality on the future occupiers of the development

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	<p>existing air quality problems.</p> <ul style="list-style-type: none"> - Promote sustainable design and construction to reduce emissions from the demolition and construction of buildings. - Be at least air quality neutral and not lead to further deterioration of poor air quality. - Ensure that where provision needs to be made to reduce development emissions this is usually on site. 	<p>can be adequately mitigated.</p> <p>The proposal is considered to demonstrate the influence of this policy and compliance with its key objectives.</p>
<p>Policy 7.15 (Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes)</p>	<p>Proposals should seek to manage noise by:</p> <ul style="list-style-type: none"> - Avoiding significant adverse noise impacts on health and quality of life as a result of new development. Improving and enhancing the acoustic environment and promoting appropriate soundscapes. Promote new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver 	<p>Compliant: The proposal is considered to demonstrate the influence of this policy and compliance with its key objectives. The development would not have a significant adverse impact on neighbouring occupiers and users and the amenities of future occupiers would be adequately protected as far as is practicable in this instance.</p>
<p>Policy 7.18 (Protecting open space and addressing deficiency)</p>	<p>The loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area. Replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate</p>	<p>Compliant: Plots 53 and 54 are currently used by local residents as informal open space. The loss of this green space to development has been established within both the 2010 and 2014 outline permissions and has been found to be acceptable due to the overall increase in open space within the Brent Cross Development in its end state and more immediately by the improvements to Claremont Open Space and Clitterhouse Playing fields in Phase 1A (North).</p>
<p>Policy 7.19 (Biodiversity and access to nature)</p>	<p>Proposals should:</p> <ul style="list-style-type: none"> - Wherever possible make a positive contribution to the protection, enhancement, creation and management of biodiversity. - Prioritise assisting in meeting targets in biodiversity action plans and/or improve access to nature in areas deficient in accessible wildlife sites. - Be resisted where they have significant adverse impacts on the population or conservation status of a protected species, or a priority species or habitat identified in a 	<p>Compliant: The application is considered to demonstrate the influence of this policy and includes measures to make a positive contribution to biodiversity.</p> <p>Conditions have been recommended to ensure that the key objectives of this policy would be carried through at implementation.</p>

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	biodiversity action plan.	
Policy 7.21 (Trees and woodlands)	Existing trees of value should be retained and any loss as a result of development should be replaced. Wherever appropriate the planting of additional trees should be included in developments.	Compliant: The application is considered to demonstrate the influence of this policy and compliance with its key objectives. The proposal would result in the removal of some trees and retention of others on the boundaries of the site. Adequate replacement planting has been proposed. Conditions have been recommended to ensure that the key objectives of this policy would be carried through at implementation.

**Table 2.2: Analysis of the proposals compliance with Barnet's Local Plan Policies
(September 2012)**

Policy	Content Summary	Extent of Compliance and Comment
Core Strategy		
CS NPPF (National Planning Policy Framework – presumption in favour of sustainable development)	Take a positive approach to proposals which reflect the presumption in favour of sustainable development and approve applications that accord with the Local Plan, unless material considerations indicate otherwise. Where there are no policies relevant to the proposal or the relevant policies are out of date permission should be granted, unless material considerations indicate otherwise.	Compliant: the proposal is considered to constitute sustainable development in accordance with the NPPF and which complies with Local Plan taken as a whole. It has therefore been recommended for approval.
CS1 (Barnet's place shaping strategy – the three strands approach)	<p>As part of its 'Three Strands Approach' the council will:</p> <ul style="list-style-type: none"> - Concentrate and consolidate growth in well located areas that provide opportunities for development, creating a high quality environment that will have positive impacts. - Focus major growth in the most suitable locations and ensure that this delivers sustainable development, while continuing to conserve and enhance the distinctiveness of Barnet as a place to live, work and visit. 	<p>Compliant: the proposal is considered to show the influence of this policy and demonstrates compliance with its key objectives.</p> <p>As an Opportunity Area in the Mayor's London Plan, the wider BXC scheme has been developed with the consideration that the site has significant capacity for new housing, commercial and other development linked to existing or potential improvements to public transport accessibility.</p> <p>It is considered that the proposals for Plots 53 and 54 achieve the relevant strategic requirements of this policy and will deliver an optimised housing scheme.</p>
CS2 – Brent Cross - Cricklewood	<p>The Council will seek comprehensive redevelopment of Brent Cross – Cricklewood in accordance with the London Plan, the saved UDP policies (Chapter 12) and the adopted Development Framework. The Policy makes provision for the following:</p> <ul style="list-style-type: none"> • It is considered likely that comprehensive regeneration will be achieved in accordance with the planning permission. If this is not achieved, the Council will consider whether in the circumstances the Local Plan needs to be reviewed. • Specific monitoring indicators for Brent Cross – Cricklewood are set out in Appendix B of the Core Strategy On the basis of 	<p>Compliant: The S73 consent provides for the comprehensive redevelopment of Brent Cross Cricklewood in accordance with this policy and the Saved UDP policies. The S73 consent, on the basis of the conditions and planning obligations associated with it, will continue to ensure that the development is commenced in accordance with the CS2 milestones in Appendix B. The CPO for Phase 1 has now been lodged and is currently out to consultation. This RMA application will allow the delivery of housing to facilitate the decant of the Whitefields Estate Residents (Part 1) which in turn will allow key infrastructure for Phase 1A (North) to be delivered.</p>

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	<p>these indicators it is expected that comprehensive re-development will commence in relation to Phase 1 at some time between 2015 and 2017.</p> <ul style="list-style-type: none"> • If these milestones are not achieved (or are not likely to be capable of being delivered) we will consider the possible need for a review of the Core Strategy Policy on Brent Cross – Cricklewood • The key milestone for the regeneration of Brent Cross – Cricklewood is likely to be the Phase 1 Compulsory Purchase Order (CPO). If by the end of 2014 any CPO that is required to deliver Phase 1 and commence the development has not been made and submitted for confirmation we will instigate a review of the policy framework for Brent Cross – Cricklewood. 	
CS3 (Distribution of growth in meeting housing aspirations)	BXC is identified as LBB's focus for growth within the North West London – Luton Coordination Corridor.	Compliant: The development potential of Plots 53 and 54 has been optimised and this RMA application will deliver 47 housing units contributing towards strategic housing targets for Barnet and London.
CS4 (Providing quality homes and housing choice in Barnet)	<p>Aim to create successful communities by:</p> <ul style="list-style-type: none"> - Seeking to ensure a mix of housing products that provide choice for all are available. - Ensuring that all new homes are built to the Lifetime Homes Standard and that the wider elements of schemes include the relevant inclusive design principles. - Seeking a variety of housing related support options. - Delivering 5500 new affordable homes by 2025/26 and seeking a borough wide target of 40% affordable homes on sites capable of accommodating 10 or more dwellings. - Seek an appropriate mix of affordable housing comprising 60% social rented housing and 40% intermediate housing. 	<p>Compliant: The proposal provides an appropriate mix of dwelling types and sizes which has specifically been informed by the housing needs assessment of Whitefields Estate Residents (Part 1) and includes a range of measures to ensure that the development would provide an inclusive environment for all members of the community. This includes all the dwellings proposed being constructed to achieve the relevant Lifetime Homes standards.</p> <p>This RMA application will provide 31 social rented homes for secure tenants and 15 homes for existing resident leaseholders/freeholders in the Whitefield Estate. This will allow the decant of the Whitefield Estate Residents (Part 1).</p> <p>The proposals are considered to be high quality design creating a quality environment that meets the relevant standards.</p>

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<p>CS5 (Protecting and enhancing Barnet's character to create high quality places)</p>	<p>The council will ensure that development in Barnet respects local context and distinctive local character, creating places and buildings with high quality design.</p> <p>Developments should:</p> <ul style="list-style-type: none"> - Address the principles, aims and objectives set out in the relevant national guidance. - Be safe attractive and fully accessible. - Provide vibrant, attractive and accessible public spaces. - Respect and enhance the distinctive natural landscapes of Barnet. - Protect and enhance the gardens of residential properties. - Protect important local views. - Protect and enhance the boroughs high quality suburbs and historic areas and heritage. - Maximise the opportunity for community diversity, inclusion and cohesion. - Contribute to people's sense of place, safety and security. 	<p>Compliant: The application is considered to demonstrate the influence of this policy and compliance with its key objectives.</p> <p>The design approach proposed takes suitable account of its context, the character of the area, the relationship with neighbouring buildings and spaces and provides a scheme of an appropriate standard. The new dwellings proposed would all be of a sufficiently high quality internally, externally and in relation to their immediate context and the wider environment.</p>
<p>CS7 (Enhancing and protecting Barnet's open spaces)</p>	<p>Create a greener Barnet by:</p> <ul style="list-style-type: none"> - Meeting increased demand for access to open space and opportunities for physical activity. - Improving access to open space in areas of public open space deficiency. - Securing improvements to open spaces including provision for children's play sports facilities and better access arrangements, where opportunities arise. - Maintaining and improving greening by protecting incidental spaces, trees, hedgerows and watercourses. - Protecting existing site ecology and ensuring development makes the fullest contributions enhancing biodiversity. - 	<p>Compliance: Plots 53 and 54 are currently used by local residents as informal open space. The loss of this green space to development has been established within both the 2010 and 2014 outline permissions and has been found to be acceptable due to the overall increase in open space within the wider Brent Cross Development in its end state and more immediately by the improvements to Claremont Open Space and Clitterhouse Playing fields in Phase 1A (North). The Claremont Park Open Space and Clitterhouse Playing Fields Improvements (Part 1) are currently under consideration under a separate reserved matters application (15/00769/RMA) for Phase 1A (North).</p> <p>Given the loss of informal play space on the Brent Terrace Triangles at an earlier time than considered within the S73 Consent it is considered appropriate to attach a condition to this reserved matters application requiring a committed programme for the delivery of the Open Space Improvements to Clitterhouse Playing Fields (Part 1) and Claremont Park Open Space to be submitted to and approved in writing by the Local Planning Authority prior to the development of these sites, furthermore the</p>

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		condition requires delivery of the improvement works prior to occupation of the residential units.
CS9 (Providing safe, efficient and effective travel)	<p>Developments should provide and allow for safe effective and efficient travel and include measures to make more efficient use of the local road network.</p> <p>The council will support more environmentally friendly transport networks, including the use of low emission vehicles (including electric cars), encouraging mixed use development and seeking to make cycling and walking more attractive for leisure, health and short trips.</p>	<p>Compliance: The proposal is considered to demonstrate the influence of this policy and compliance with its key objectives.</p> <p>The RMTA is considered to have assessed the impact of the proposed development of Plots 53 and 54 over an appropriate area of influence. No significant impacts on the adjacent local highway network have been identified. The design of the development is considered to take full account of the safety of all road users, includes appropriate access arrangements and would not unacceptably increase conflicting movements on the road network or increase the risk to vulnerable road users.</p>
CS11 (Improving health and wellbeing in Barnet)	<p>Will improve health and wellbeing in Barnet through a range of measures including supporting healthier neighbourhoods, ensuring increased access to green spaces and improving opportunities for higher levels of physical activity.</p>	<p>Compliant: The design of the development has been influenced by the desire to create a healthy residential environment. The proposal is found to be compliant with the objectives of this policy.</p> <p>It is considered that the improvements proposed through the quality of building design and construction and the environment and public realm will make a significant contribution towards improving health and well being. Improvements to Clitterhouse Playing fields as part of Phase 1A (North) will also provide opportunities for higher levels of physical activity in accordance with policy requirements.</p>
CS12 (Making Barnet a safer place)	<p>The Council will:</p> <ul style="list-style-type: none"> - Encourage appropriate security and community safety measures in developments and the transport network. - Require developers to demonstrate that they have incorporated community safety and security design principles in new development. - Promote safer streets and public areas, including open spaces. 	<p>Compliant: The design of the proposal is considered to demonstrate the influence of this policy and be compliant with the key elements of this policy.</p> <p>The development incorporates the principles of "Secured by design".</p> <p>The Metropolitan Police Service and London Fire and Emergency Protection Authority have not expressed any concerns about the proposals.</p> <p>Car parking is provided within the site in areas with significant levels of overlooking providing a high degree of security for vehicle owners.</p> <p>The level of activity resulting from the development along with passive overlooking will improve security within publicly accessible open space to the north of plot 53 as well as to the pedestrian cut through to the south of plot 54.</p>
CS13 (Ensuring the efficient use of natural resources)	<p>The council will:</p> <ul style="list-style-type: none"> - Seek to minimise Barnet's contribution to climate change and ensure that the borough develops in a way which respects environmental limits and improves quality of life. 	<p>Compliant: The wider BXC development includes a range of climate change mitigation. The proposed RMA development is required by condition 35.6 of the S73 Consent to comply with the approved revised energy strategy. The performance standards of the buildings on-site will be maximised in order to reduce carbon dioxide emissions. A</p>

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	<ul style="list-style-type: none"> - Promote the highest environmental standards for development to mitigate and adapt to the effects of climate change. - Expect development to be energy efficient and seek to minimise any wasted heat or power. - Expect developments to comply with London Plan policy 5.2. - Maximise opportunities for implementing new district wide networks supplied by decentralised energy. - Make Barnet a water efficient borough, minimise the potential for fluvial and surface flooding and ensure developments do not harm the water environment, water quality and drainage systems. - Seek to improve air and noise quality. 	<p>condition is recommended to this reserved matters application for compliance to be demonstrated. The development is considered to be in accordance with this policy.</p> <p>Water conservation measures will be applied to all dwellings with sustainable drainage applied to manage surface water.</p> <p>The proposal would not have a significant adverse impact on the local noise environment or air quality.</p>
CS14 (Dealing with our waste)	The council will encourage sustainable waste management by promoting waste prevention, re-use, recycling, composting and resource efficiency over landfill and requiring developments to provide appropriate waste and recycling facilities.	Compliant: Conditions have been recommended which require the provision of suitable waste and recycling facilities for the proposed units.
CS15 (Delivering the Core Strategy)	The council will work with partners to deliver the vision, objectives and policies of the Core Strategy, including working with developers and using planning obligations (and other funding mechanism where appropriate) to support the delivery of infrastructure, facilities and services to meet needs generated by development and mitigate the impact of development.	Compliant: The planning obligations attached to the S73 Consent secure appropriate contributions and direct delivery of infrastructure as part of the wider BXC development.
Adopted UDP (May 2006) Saved Policies (May 2009) as referred to in Core Strategy Policy CS2		
GCrick Cricklewood, Brent Cross and West Hendon Regeneration Area	<ul style="list-style-type: none"> - The Council seeks integrated regeneration in the Cricklewood, Brent Cross and West Hendon Regeneration Area. - All development to the highest environmental and design standards 	<p>Compliant: It is considered that the proposals for Plots 53 and 54 optimise the development potential of the land. The RMA application will deliver 47 housing units as part of the wider BXC development.</p> <p>The proposed development meets and achieves amenity space standards for future residents as specified in the Design and Access Statement for the S73 Consent and is higher than London Plan amenity space standards, and meets or exceeds the London Plan internal space standards. The submitted plans demonstrate that all flats and</p>

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		<p>houses meet these minimum standards with many exceeding them. The individual dimensions and room sizes within the flats comply with the standards set out in Annex 1 of the London Housing SPG.</p> <p>The units proposed will allow the decant of the Whitefields Estate Residents and will therefore support the wider regeneration. Phase 1A (North) of the BXC development includes highways infrastructure, River Brent re-routeing and Bridge works, Clitterhouse Playing Fields Part 1 (excluding the Nature Park) and the Claremont Park Improvements and the Living Bridge. The proposed development will therefore be well integrated with the surrounding area.</p>
C1 Comprehensive Development	<ul style="list-style-type: none"> - The Council seeks the comprehensive development of the regeneration area in accordance with the area framework and delivery strategy. - Development proposals will need to meet policies of the UDP and their more detailed elaboration in the development framework. 	Compliant: The scheme accords with this policy. The RMA application for Plots 53 and 54 are part of the wider outline consent for the comprehensive redevelopment of the Brent Cross Cricklewood regeneration area.
C2 Urban Design & Quality	The Council will seek to achieve the standards of urban design for the Regeneration Area to result in a development of landmark quality.	Compliant: It is considered that the development proposed for Plots 53 and 54 will deliver a high quality environment in accordance with accepted principles of good urban design and this policy.
C3 Urban Design – Amenity	The development should protect and improve the existing amenities of existing residents.	Complaint: The proposals are not considered to result in significant harm to the amenities of existing neighbouring occupiers. At upper floors there is a 22m distance between the proposed elevations and those of existing Brent terrace properties, exceeding Barnet's privacy standards. The combination of planting, level changes and the low frequency of windows to habitable rooms in elevations in the closest proximity to the boundary with Clitterhouse Crescent combined with the hedge planting to the western boundary result in a development which is acceptable in terms of its privacy impacts upon existing residents. The submitted BRE daylight, sunlight and overshadowing assessment produced by GL Hearne concludes that in terms of overshadowing the proposed development would accord with BRE Standards resulting in no significant overshadowing to properties on Clitterhouse Crescent or Brent Terrace. A detailed Acoustic Design Report was submitted and approved under planning condition 29.1 regarding the potential noise impacts upon Plots 53 and 54. This confirmed that noise levels within the proposed development were acceptable and that good internal noise standards with reference to BS8233

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		would be achieved for all proposed units.
C4 Sustainable Design	<p>The Council will seek to ensure that the Regeneration Area pursues the highest standards of environmental design, including:</p> <ul style="list-style-type: none"> • meet high performance standards for environmentally sustainable design and construction • an integrated network of public open spaces • There must be a buffer zone, appropriate protection of legally protected species, and opportunities taken to enhance the biodiversity of the area. 	<p>Compliant: It is considered that the development will maximise the use of land and improve open space, cycle and pedestrian networks in accordance with the planning conditions and obligations. The application was supported by energy and sustainability strategies and a number of planning conditions and obligations are included to ensure sustainability targets are met. The development will result in a net gain in biodiversity in terms of habitat quality and connectivity. Substantial improvements are proposed to the River Brent and its corridor. Therefore it is considered that all criteria of this policy are met.</p> <p>Natural England has not raised any objections to the proposal and the application is considered to demonstrate the influence of this policy.</p> <p>The performance standards of the buildings on-site will be maximised in order to reduce carbon dioxide emissions from the Scheme. Specifically, residential buildings will achieve Code for Sustainable Homes Level 4 with commercial buildings achieving BREEAM 'Very Good'.</p>
C8 Parking Standards	This sets out maximum parking standards of 1 space per residential unit within the Regeneration Area, with retail parking provision to accord to London Plan standards.	Compliant: The scheme will provide 47 car parking spaces for 47 residential units.
C9 Housing and Community Development	This policy deals with housing and community development within the Cricklewood and Brent Cross Areas However, it notes that in West Hendon an additional 2,200 homes will come forward.	Compliant: The development potential of Plots 53 and 54 has been optimised and this RMA application will deliver 47 housing units contributing towards strategic housing targets for Barnet and London as part of the wider BXC development.
C11 Implementation	The Council will require developers to provide on-site and off-site infrastructure, facilities and services to support the regeneration of the area.	Compliant: The planning obligations attached to the S73 Consent secure appropriate contributions and direct delivery of infrastructure as part of the wider BXC development.

Key relevant local and strategic supplementary planning documents

Local Supplementary Planning Documents and Guidance:

Residential Design Guide (2013)

Sustainable Design and Construction (2013)

Strategic Supplementary Planning Documents and Guidance:

Accessible London: Achieving an Inclusive Environment (April 2004)
Housing Supplementary Planning Guidance (November 2012)
Sustainable Design and Construction (May 2006)
Shaping Neighbourhoods: Play and Informal Recreation (September 2012)
Providing for Children and Young People's Play and Informal Recreation SPG
(2008)