

**LOCATION:** Grahame Park, London, NW9 5XA.

<b>REFERENCE:</b>	22/2599/RMA	<b>Received:</b>	16 May 2022
		<b>Accepted:</b>	16 May 2022
<b>WARD:</b>	Colindale North	<b>Expiry:</b>	15 August 2022

**APPLICANT:** Choices for Grahame Park/Notting Hill Genesis

**PROPOSAL:** Reserved Matters application seeking approval of, layout, scale, appearance, access and landscaping in respect of Plots H and K (Phase 2) of the Grahame Park Stage B Regeneration pursuant to Conditions 7, 10, 12, 28 and 44 attached to hybrid planning permission reference 19/5493/OUT dated 31st July 2020, involving the erection of buildings ranging between 3 and 14 storeys high comprising of 364 residential dwellings and flexible commercial space (Use Class E), a housing office (Use Class E), community centre (Use Class F2(b)), energy centre, public open space and public realm, car parking spaces, cycle parking spaces, refuse storage space, construction of part of Bristol Avenue and other associated works. The application is accompanied by an Environmental Statement of Compliance

### **Application Summary**

This is a reserved matters application for development on Plots H and K of the Grahame Park Stage B Regeneration pursuant to the hybrid planning permission reference 19/5493/OUT granted on 31<sup>st</sup> July 2020. The hybrid planning permission approved the overall parameters and design guidelines for the development including the quantum of residential units and non-residential floorspace and the building heights across the Phase 2 regeneration area.

The hybrid planning permission also approved the amount of affordable housing across the Phase 2 regeneration area which comprises 50% affordable housing (both by habitable room and floorspace) and is secured by a legal agreement. In combination with the early phases, this represents a net increase in social rent floorspace and this provision was approved by the Council and endorsed by the GLA.

### **Application Background and Summary**

Grahame Park Estate is the largest council housing estate in the borough. Although popular with many early residents when it was first built in the 1970s, significant problems arose due to a combination of factors including the concentration of vulnerable and disadvantaged people and the estate's design which isolates it from the surrounding areas. As a result, Grahame Park has suffered from serious decline and socio-economic problems over the years.

A tenants participation survey in 1999 identified a number of issues including the poor physical environment and poor image, unsafe and difficult circulation routes owing to the Radburn style separation of vehicles and pedestrians, overcrowding and inappropriate occupancy for large families, a high turnover of stock, poorly placed and poorly integrated local facilities and poor quality of shopping choice. It is for these reasons that the Council, in partnership with Choices for Grahame Park ('Choices'), decided to embark on a major programme to regenerate the estate and transform it into a thriving mixed tenure neighbourhood.

An outline planning application was submitted by Choices in 2004 for the redevelopment of the estate (reference W01731JS/04). This scheme was approved in September 2004 subject to a Section 106 Agreement. Following the completion of the Section 106 and Principal Development Agreement for the regeneration, outline planning permission was finally granted on the 31<sup>st</sup> January 2007.

This consent was subsequently amended under a Section 73 application to vary the approved phasing under reference number [W/01731/LB/07] (granted on 14<sup>th</sup> August 2008) and an extension to the time limit for implementing the planning permission which was approved on 16th February 2011 under planning reference number [H/04448/10]. All of the first portion of the regeneration (Stage A) has now been completed with a total 685 new homes having been delivered within Stage A. Of these 685 new homes, 52% are affordable (235 social rent, 38 affordable rent and 81 intermediate).

Stage A also accommodates the new Barnet and Southgate College having relocated from its former site at Grahame Park Way, the relocated Colindale Library (previously located on the Concourse) and the Council's new purpose built offices at 2 Bristol Avenue.

Both Barnet Council and the applicant (Choices for Grahame Park/Notting Hill Housing) came to the decision that the outline masterplan had become out of date and was no longer viable. As such an updated approach to the regeneration of the estate was needed, and LBB decided that – given the long-term nature of the project – a planning framework with greater flexibility than an outline permission was required. LBB therefore decided to produce a Supplementary Planning Document (SPD) for Grahame Park to set out the overall principles for regeneration along with detailed design guidance. The SPD was developed in partnership by Genesis Housing Association (GHA) and LBB, with Mae Architects leading the master planning and design elements of the SPD.

The SPD is a material consideration in the planning process for all applications affecting the Estate. The SPD sits below Barnet's Local Plan Core Strategy and Development Plan Documents, as well as the Colindale Area Action Plan (CAAP).

The Grahame Park SPD (2016) breaks Stage B down into three phases. The first phase involves the redevelopment of the Concourse area, along with a small part of Phase 3 that is currently occupied by the estate's energy centre. The entirety of Phase 1 has been allocated as an area for 'comprehensive redevelopment' which

requires the full demolition of existing buildings and structures, and new development to take the place of the existing estate.

Following the completion of the SPD a comprehensive scheme for the redevelopment of the estate was submitted in 2017 under planning application reference [17/2840/OUT] for the following development:

*'Outline planning permission for the demolition of 630 existing residential units, Everglade GP Practice, Community Hall, library and retail units and the construction in three phases (plots 10, 11 and 12) of: 1083 residential units (use Class C3); a Community Hub of approximately 3,766 sq.m (GIA) comprising a community hall and workshop rooms, a daycare nursery, a GP Health centre, community health facilities and ancillary office accommodation (all use class D1) along with 186 sq.m (GIA) café (use class A3); approximately 340 sq.m (GIA) of retail space (predominantly use class A1, along with A2, A3, A4 and/or A5) ; a flexible ground floor space of approximately 55sq.m (GIA) (use class A1 or use class B1) within Block 10B; a new energy centre to provide district heating; and associated car parking, open space, landscaping and access arrangements.*

*Within the outline application:*

- full details are submitted for the means of access, layout, scale, appearance and landscaping of Plots 10 and 12 and associated works; and*
- full details of Plot 11 are submitted for the means of access, layout, scale, appearance and landscaping with the exception of Plot 11D, where details of layout and scale are submitted, with means of access, appearance and landscaping reserved.'*

The London Borough of Barnet resolved in November 2017 to grant planning permission subject to referral to the Mayor of London.

The Mayor of London subsequently directed Barnet Council to refuse the scheme in December 2017 for the following reasons:

- 1. The application demonstrably fails to replace the existing affordable housing on either a unit, floorspace or habitable room basis, and results in the loss of 257 existing social rented units. The proposals are therefore contrary to London Plan Policy 3.14, draft London Plan Policy H10, the Mayor's Affordable Housing and Viability SPG and the Mayor's draft Good Practice Guide to Estate Regeneration.*
- 2. In the absence of a planning obligation that provides a minimum of £840,000 to deliver additional bus capacity, the impact of additional peak hour trips on the bus network in the area remain unmitigated and are therefore likely to have unacceptable impact on the public transport network, as well as failing to ensure that alternatives to the private car are accessible and appealing, contrary to London Plan policies 6.3 and 8.2 draft London Plan policies T3 and DF1.*

In directing the Council to refuse the application, the Mayor set out his view that it was possible for the proposals to be successfully amended to better optimise the development and housing potential of the site and ensure that replacement social rented housing and necessary transport mitigation was secured. It was advised that

the Council and applicant work with the GLA and TfL to bring forward a revised scheme that met these strategic objectives.

The application was subsequently refused on the 13<sup>th</sup> February 2018 in accordance with the Mayoral direction.

A subsequent planning application reference [19/5493/OUT] was developed in order to overcome the GLA's reasons for refusal as well as fulfilling Barnet Council's objectives for the regeneration of the Grahame Park Estate and follows extensive pre application discussions between Notting Hill Genesis and Barnet Council along with pre application discussions with the GLA.

The description of development was as follows:

*'Hybrid planning application for the demolition of 630 residential units and existing commercial, retail and community floorspace, and the phased redevelopment of Plots 10-12 of Grahame Park comprising a full planning application for the redevelopment of Plot A and an outline planning application for the redevelopment of Plots B to Q for up to 2,088 residential units and up to 5,950sq.m (GEA) of flexible non-residential floorspace.*

*Full planning permission is sought for the demolition of 113 existing homes and the redevelopment of Plot A comprising the erection of 5 buildings between 3 and 11 storeys to provide 209 new homes and 440sq.m (GEA) of non-residential floorspace (Use Class A1, A2, A3, B1), landscape, public open space and public realm, associated car parking, cycle spaces and other associated works.*

*Outline planning permission (scale, layout, landscaping and appearance reserved) for the demolition of 517 existing residential units, buildings and structures on Plots B to Q, and the redevelopment of the site in a series of phases to provide up to 1,879 new homes and up to 5,510sq.m (GEA) of non-residential floorspace within classes A1, A2, A3, A4, B1, D1 and D2 including a community centre and children's day nursery in buildings ranging in height from 3 storeys to 15 storeys, with associated public open space, hard and soft landscaping, public realm, car parking spaces, and cycle parking spaces, stopping up and diversion of Lanacre Avenue and associated works'*

The application was reported to the Strategic Planning Committee Meeting of the 2<sup>nd</sup> March 2020 where members resolved to grant planning permission subject to approval from the Mayor of London and completion of a legal agreement. These were received and concluded and the planning permission was subsequently issued on the 31<sup>st</sup> July 2020. Work on the redevelopment of Plot A (detailed element) has started on site.

The current application is the first Reserved Matters application pursuant to the outline approval concerning the development of Plots H and K within phase 2 of the Grahame Park redevelopment involving the erection of buildings ranging between 3 and 14 storeys high comprising of 364 residential dwellings and flexible commercial space (Use Class E), a housing office (Use Class E), community centre (Use Class F2(b)), energy centre, public open space and public realm, car parking spaces,

cycle parking spaces, refuse storage space, construction of part of Bristol Avenue and other associated works.

The proposed submission has been considered in the context of the parameters approved under the outline consent taking into account representations received and is considered acceptable by officers and is recommended for approval subject to appropriate conditions.

## **RECOMMENDATION**

### **Recommendation 1**

The Committee grants delegated authority to the Service Director Planning & Building Control or Head of Strategic Planning to make any minor alterations, additions or deletions to the recommended conditions/obligations or reasons for refusal as set out in this report and addendum provided this authority shall be exercised after consultation with the Chair (or in his absence the Vice-Chair) of the Committee (who may request that such alterations, additions or deletions be first approved by the Committee).

### **Conditions**

1. The development hereby permitted shall be carried out in accordance with the following approved plans:

Drawings:

HP-PTA-MP-ZZ-DR-A-1100_S4-PL2	Site Location Plan
HP-PTA-PH2-RF-DR-A-9000_S4-PL3	PH2 - General arrangement plan - Proposed Site Plan
HP-PTA-PH2-RF-DR-A-9001_S4-PL2	PH2 - General arrangement plan - Proposed Interim Site Plan
HP-PTA-H0-00-DR-A-9100_S4-PL3	Plot H - General arrangement plan - Ground floor
HP-PTA-H0-01-DR-A-9101_S4-PL3	Plot H - General arrangement plan - Level 01
HP-PTA-H0-02-DR-A-9102_S4-PL3	Plot H - General arrangement plan - Level 02
HP-PTA-H0-03-DR-A-9103_S4-PL3	Plot H - General arrangement plan - Level 03
HP-PTA-H0-04-DR-A-9104_S4-PL3	Plot H - General arrangement plan - Level 04
HP-PTA-H0-05-DR-A-9105_S4-PL3	Plot H - General arrangement plan - Level 05
HP-PTA-H0-06-DR-A-9106_S4-PL3	Plot H - General arrangement plan - Level 06

HP-PTA-H0-07-DR-A-9107_S4-PL3 Level 07	Plot H - General arrangement plan -
HP-PTA-H0-08-DR-A-9108_S4-PL3 Level 08	Plot H - General arrangement plan -
HP-PTA-H0-09-DR-A-9109_S4-PL3 Level 09	Plot H - General arrangement plan -
HP-PTA-H0-10-DR-A-9110_S4-PL3 Level 10	Plot H - General arrangement plan -
HP-PTA-H0-11-DR-A-9111_S4-PL3 Level 11	Plot H - General arrangement plan -
HP-PTA-H0-12-DR-A-9112_S4-PL3 Level 12	Plot H - General arrangement plan -
HP-PTA-H0-13-DR-A-9113_S4-PL3 Level 13	Plot H - General arrangement plan -
HP-PTA-H0-RF-DR-A-9115_S4-PL3 Roof Level	Plot H - General arrangement plan -
HP-PTA-K0-00-DR-A-9100_S4-PL3 Ground Floor	Plot K - General arrangement plan -
HP-PTA-K0-01-DR-A-9101_S4-PL3 Level 01	Plot K - General arrangement plan -
HP-PTA-K0-02-DR-A-9102_S4-PL3 Level 02	Plot K - General arrangement plan -
HP-PTA-K0-03-DR-A-9103_S4-PL3 Level 03	Plot K - General arrangement plan -
HP-PTA-K0-04-DR-A-9104_S4-PL3 Level 04	Plot K - General arrangement plan -
HP-PTA-K0-05-DR-A-9105_S4-PL3 Level 05	Plot K - General arrangement plan -
HP-PTA-K0-06-DR-A-9106_S4-PL3 Level 06	Plot K - General arrangement plan -
HP-PTA-K0-07-DR-A-9107_S4-PL3 Level 07	Plot K - General arrangement plan -
HP-PTA-K0-08-DR-A-9108_S4-PL3 Level 08	Plot K - General arrangement plan -
HP-PTA-K0-09-DR-A-9109_S4-PL3 Level 09	Plot K - General arrangement plan -
HP-PTA-K0-10-DR-A-9110_S4-PL3 Level 10	Plot K - General arrangement plan -
HP-PTA-K0-11-DR-A-9111_S4-PL3 Level 11	Plot K - General arrangement plan -
HP-PTA-K0-M0-DR-A-9119_S4-PL3 Mezzanine Floor	Plot K - General arrangement plan -
HP-PTA-K0-RF-DR-A-9115_S4-PL3 Roof Level	Plot K - General arrangement plan -
HP-PTA-H0-ZZ-DR-A-9200_S4-PL2 - H2 & H4 south	Plot H - General arrangement elevation
HP-PTA-H0-ZZ-DR-A-9201_S4-PL2 - H1 & H3 north	Plot H - General arrangement elevation

HP-PTA-H0-ZZ-DR-A-9202_S4-PL2	Plot H - General arrangement elevation - H1 & H2 west
HP-PTA-H0-ZZ-DR-A-9203_S4-PL2	Plot H - General arrangement elevation - H1 and H2 east
HP-PTA-H0-ZZ-DR-A-9204_S4-PL2	Plot H - General arrangement elevation - H1 south & H2 north
HP-PTA-H0-ZZ-DR-A-9205_S4-PL2	Plot H - General arrangement elevation - H3 and H4 west
HP-PTA-H0-ZZ-DR-A-9206_S4-PL2	Plot H - General arrangement elevation - H3 and H4 east
HP-PTA-H0-ZZ-DR-A-9207_S4-PL2	Plot H - General arrangement elevation - H3 south & H4 north
HP-PTA-K0-ZZ-DR-A-9200_S4-PL3	Plot K - General arrangement elevation - K1 & K2 south
HP-PTA-K0-ZZ-DR-A-9201_S4-PL3	Plot K - General arrangement elevation - K1 & K2 north
HP-PTA-K0-ZZ-DR-A-9202_S4-PL3	Plot K - General arrangement elevation - K1 west
HP-PTA-K0-ZZ-DR-A-9203_S4-PL2	Plot K - General arrangement elevation- K2 east
HP-PTA-K0-ZZ-DR-A-9204_S4-PL2	Plot K - General arrangement elevation - K2 west
HP-PTA-K0-ZZ-DR-A-9205_S4-PL3	Plot K - General arrangement elevation - K1 east
HP-PTA-H0-ZZ-DR-A-9302_S4-PL3	Plot H - General arrangement section - C-C
HP-PTA-H0-ZZ-DR-A-9304_S4-PL3	Plot H - General arrangement section - E-E
HP-PTA-H0-ZZ-DR-A-9305_S4-PL3	Plot H - General arrangement section - F-F
HP-PTA-K0-ZZ-DR-A-9300_S4-PL4	Plot K - General arrangement section - A-A
NHG-GPE_HTA-L_DR_0900_C	Landscape GA - Render Masterplan
NHG-GPE_HTA-L_DR_0901_D	Landscape GA - Hard Landscape – Ground Floor
NHG-GPE_HTA-L_DR_0902_B	Landscape GA - Planting Plan – Ground Floor
NHG-GPE_HTA-L_DR_0903_B	Landscape GA - Levels Plan – Ground Floor 1 of 2
NHG-GPE_HTA-L_DR_0904_B	Landscape GA - Levels Plan – Ground Floor 2 of 2
NHG-GPE_HTA-L_DR_0905_B	Landscape GA - Soiling Plan – Ground Floor
NHG-GPE_HTA-L_DR_0923_D	Landscape GA - Hard Landscape – Blocks H and K Podiums
NHG-GPE_HTA-L_DR_0924_B	Landscape GA - Planting Plan – Blocks H and K Podiums

NHG-GPE_HTA-L_DR_0925_B	Landscape GA - Soiling Plan – Blocks H and K Podiums
NHG-GPE_HTA-L_DR_0950_C	Typical Details - Site Sections – Ground Floor
NHG-GPE_HTA-L_DR_0951_B	Typical Details - Site Sections – Blocks H Podium
NHG-GPE_HTA-L_DR_0952_B	Typical Details - Site Section – Blocks K Podium
NHG-GPE_HTA-L_DR_0960_B	Typical Details - Soft Landscape
NHG-GPE_HTA-L_DR_0961_B	Typical Details - Hard Landscape

#### Documents:

Schedule of Accommodation (03 May 2022) prepared by Patel Taylor Architects

Arboricultural Impact Assessment & Method Statement (May 2022), prepared by Tamla Trees

Daylight and Sunlight Report (April 2022), prepared by Point 2 Surveyors Ltd

Internal Daylight Report (April 2022), prepared by Point 2 Surveyors Ltd

Design and Access Statement (May 2022), prepared by Patel Taylor Architects

Drainage & SuDS Strategy (22 April 2022), prepared by Curtins Consulting Ltd

Energy and Overheating Assessment (22 April 2022), prepared by Max Fordham LLP

Equalities Impact Assessment (May 2022), prepared by hgh Consulting

Environmental Statement of Compliance (May 2022), prepared by hgh Consulting

RIBA Stage 3 Fire Strategy Report Plot H (26 April 2022), prepared by FDS Consult UK

RIBA Stage 3 Fire Strategy Report Plot K (26 April 2022), prepared by FDS Consult UK

Block H Planning Gateway 1 Fire Statement (23 March 2022), prepared by FDS Consult UK

Block K Planning Gateway 1 Fire Statement (24 March 2022), prepared by FDS Consult UK

Phase 2 Ground Investigation (09 February 2022), prepared by Curtins Consulting Ltd

Planning Statement (May 2022), prepared by hgh Consulting

Ecological Update (2022), prepared by ADAS

Statement of Community Involvement (May 2022), prepared by hgh Consulting

Sustainability Statement (22 April 2022), prepared by Max Fordham LLP

Transport Statement (28 April 2022), prepared by RPS Consulting Services Ltd

Utilities Statement (22 April 2022), prepared by Max Fordham LLP

Quantitative Wind Microclimate Assessment (21 April 2022), prepared by SLR Consulting



Reason: For the avoidance of doubt and in the interests of proper planning and so as to ensure that the development is carried out fully in accordance with the plans as assessed in accordance with policies DM01 of the Adopted Barnet Development Management Policies DPD (2012) and NPPF and CS1 of the Adopted Barnet Core Strategy DPD (2012).

2. Prior to the commencement of the highways works, a suitably worded agreement shall be entered into with the Highway Authority to secure delivery of the highways works. The highways works shall be completed in accordance with the details in the agreement.

Reason: to ensure the appropriate deliver of the highway works in accordance with London Borough of Barnet's Local Plan Policy CS9 of Core Strategy (Adopted) September 2012 and Policy DM17 of Development Management Policies (Adopted) September 2012.

3. Prior to the felling of the group of trees ref TG3 (as shown on the Tree Constraints Plan at Appendix 5 of the Tamala Trees Arboricultural Impact Assessment & Method Statement dated May 2022) a Ground Level Tree Assessment shall be undertaken by a suitably trained ecologist to assess the trees for potential bat roost features.

If bat roost features are found, a climbing inspection by a suitably trained ecologist with the use of an endoscope to determine the presence or absence of roosting bats shall be carried out between May and September.

If no bats are recorded within the trees, then a report containing the findings of the surveys shall be submitted to and approved by the local planning authority in writing prior to the felling of the trees.

If a roosting bat is discovered, then works that would impact the tree must not take place until Natural England has been informed and the appropriate European Protected Species mitigation licence has been obtained.

Reason: To avoid the potential of an offence the Wildlife and Countryside Act, 1981, as amended.

4. Prior to the commencement of the development, details of the means of escape for each building and firefighting access and facilities in each car park will be submitted to and agreed in writing by the local planning authority.

The development will be carried out in accordance with the approved details.

Reason: To ensure that the fire safety of the proposed buildings is managed in a satisfactory manner and ensure that the development contributes to fire safety in line with Policy D12 of the London Plan (2021)

5. *Prior to the commencement of above ground works for each individual building, the following details for that building shall be submitted to and*

*approved in writing by the Local Planning Authority (unless otherwise approved and agreed):*

- i. Full details (including samples, where appropriate) of the materials and finishes to be used on all external surfaces
- ii. Door, entrances, windows (including glazing specifications) and balconies (including drawings and section showing thresholds to adjacent internal spaces and drawings and sections of privacy screens)

Thereafter the feature hereby approved shall be installed prior to occupation and thereafter maintained in secure and good working order for the lifetime of the development.

Reason: To safeguard the character and visual amenities of the site and wider area and to ensure that the building is constructed in accordance with Policies CS5 and DM01 of the Barnet Local Plan and Policy D4 of the London Plan (2021).

### **INFORMATIVE(S):**

1. In accordance with paragraphs 38-57 of the NPPF, the Local Planning Authority (LPA) takes a positive and proactive approach to development proposals, focused on solutions. The LPA has produced planning policies and written guidance to assist applicants when submitting applications. These are all available on the Council's website. A pre-application advice service is also offered and the Applicant engaged with this prior to the submissions of this application. The LPA has negotiated with the applicant/agent where necessary during the application process to ensure that the proposed development is in accordance with the Development Plan.

2. Bats and their roost are strictly protected from damage or disturbance under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Section 42 of the Conservation of Habitat and Species Regulation 2017. Therefore, any activities which have the potential to impact a bat, or its roost will require appropriate mitigation and compensation under the auspice of a Natural England European Protected Species mitigation licence. Pursuant to section 197 of the Town and Country Planning Act 1990 in accordance with local planning policy DM01 & DM16. Policies CS5 and CS7 of the Local Plan Core Strategy DPD (adopted September 2012), Policy G5, G6 & G7 of the London Plan and 2021 Environment Act 2021.

3. A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing [trade.effluent@thameswater.co.uk](mailto:trade.effluent@thameswater.co.uk). Application forms should be completed on line via

<https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=05%7C01%7CAndrew.Dillon%40Barnet.gov.uk%7Cc2a2573d6ac64a3d88a408da4d2466fd%7C1ba468b914144675be4f53c478ad47bb%7C0%7C0%7C637907115978311828%7CUnknown%7CTWFpbGZsb3d8eyJWlloiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=0ufHg79rekdJRcj8K3h6v9XT89CNPqseb2TK6dC4o74%3D&reserved=0>. Please refer to the Wholesale; Business customers; Groundwater discharges section.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local water courses

## **1. MATERIAL CONSIDERATIONS**

### **1.1 Key Relevant Planning Policy**

#### Introduction

Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that development proposals shall be determined in accordance with the development plan unless material considerations indicate otherwise. In this case the development plan is The London Plan and the development plan documents in the Barnet Local Plan. These statutory development plans are the main policy basis for the consideration of this planning application.

A number of other planning documents, including national planning guidance and supplementary planning guidance and documents are also material to the determination of this application.

#### National Planning Policy Framework

The determination of planning applications is made mindful of Central Government advice and the Local Plan for the area. It is recognised that Local Planning Authorities must determine applications in accordance with the statutory Development Plan, unless material considerations indicate otherwise, and that the planning system does not exist to protect the private interests of one person against another.

The revised National Planning Policy Framework (NPPF) was published on 20<sup>th</sup> July 2020. This is a key part of the Governments reforms to make the planning system less complex and more accessible, and to promote sustainable growth.

The NPPF states that 'good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.... being clear about design expectations, and how these will be tested, is essential for achieving this". The NPPF retains a presumption in favour of sustainable development. This applies unless any adverse

impacts of a development would 'significantly and demonstrably' outweigh the benefits.

### The Mayor's London Plan 2021

The new London Plan which sets out the Mayor's overarching strategic planning framework for the next 20 to 25 years was adopted on the 2nd March 2021 and now supersedes the previous Plan (2016).

The new London Plan policies (arranged by chapter) most relevant to the determination of this application are:

#### Chapter 1

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG4 Delivering the homes Londoners need
- GG5 Growing a good economy
- GG6 Increasing efficiency and resilience

#### Chapter 2

- Policy SD1 Opportunity Areas
- Policy SD3 Growth locations in the Wider South East and beyond
- Policy SD10 Strategic and local regeneration

#### Chapter 3

- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering good design
- Policy D5 Inclusive design
- Policy D6 Housing quality and standards
- Policy D7 Accessible housing
- Policy D8 Public realm
- Policy D9 Tall Buildings
- Policy D11 Safety, Security and resilience to emergency
- Policy D12 Fire safety
- Policy D14 Noise

#### Chapter 4

- Policy H1 Increasing housing supply
- Policy H2 Small sites
- Policy H3 Meanwhile use as housing
- Policy H4 Delivering affordable housing
- Policy H5 Threshold approach to applications
- Policy H6 Affordable housing tenure
- Policy H7 Monitoring of affordable housing
- Policy H8 Loss of existing housing and estate redevelopment

Policy H10 Housing size mix

## Policy H11 Build to Rent

### Chapter 5

Policy S4 Play and informal recreation

Policy S5 Sports and recreation facilities

### Chapter 7

Policy HC3 Strategic and Local Views

Policy HC4 London View Management Framework

### Chapter 8

Policy G1 Green infrastructure

Policy G4 Open space

Policy G5 Urban greening

Policy G6 Biodiversity and access to nature

Policy G7 Trees and woodlands

### Chapter 9

Policy SI 1 Improving air quality

Policy SI 2 Minimising greenhouse gas emissions

Policy SI 3 Energy infrastructure

Policy SI 4 Managing heat risk

Policy SI 5 Water infrastructure

Policy SI 6 Digital connectivity infrastructure

Policy SI 7 Reducing waste and supporting the circular economy

Policy SI 8 Waste capacity and net waste self-sufficiency

Policy SI 12 Flood risk management

Policy SI 13 Sustainable drainage

Policy SI 17 Protecting and enhancing London's waterways

### Chapter 10

Policy T1 Strategic approach to transport

Policy T2 Healthy Streets

Policy T3 Transport capacity, connectivity and safeguarding

Policy T4 Assessing and mitigating transport impacts

Policy T5 Cycling

Policy T6 Car parking

Policy T6.1 Residential parking

Policy T6.2 Office parking

Policy T9 Funding transport infrastructure through planning

### Chapter 11

Policy DF1 Delivery of the Plan and Planning Obligations

## Mayoral Supplementary Guidance

The Mayor's Supplementary Guidance most relevant to the determination of this application are:

**Planning for Equality and Diversity in London (October 2007)**

This guidance sets out some of the overarching principles that should guide planning for equality in the London context.

**The Mayor's Climate Change Mitigation and Energy Strategy (October 2011)**

The strategy seeks to provide cleaner air for London. This strategy focuses on reducing carbon dioxide emissions to mitigate climate change, securing a low carbon energy supply for London and moving London to a thriving low carbon capital.

**All London Green Grid (March 2012)**

This strategy provides guidance for designing and managing green and open spaces to bring about previously unrealised benefits. In doing so, we aim to encourage boroughs, developers, and communities to collectively increase the delivery of green infrastructure for London.

**Play and Informal Recreation (September 2012)**

Provides guidance to Local Authorities and development to estimate the potential child yield from a development, and the resulting requirements for play space provision.

**Sustainable Design and Construction (April 2014)**

The Sustainable Design and Construction (SPG) seeks to design and construct new development in ways that contribute to sustainable development.

**The control of dust and emissions during construction and demolition (July 2014)**

The aim of this supplementary planning guidance (SPG) is to reduce emissions of dust, PM<sub>10</sub> and PM<sub>2.5</sub> from construction and demolition activities in London.

**Accessible London: Achieving an Inclusive Environment (October 2014)**

The strategy sets out to provide detailed advice and guidance on the policies in the London Plan in relation to achieving an inclusive environment.

**Housing (March 2016)**

The housing SPG provides revised guidance on how to implement the housing policies in the London Plan.

**Affordable Housing and Viability (August 2017)**

Set's out the Mayor's policies for assessing and delivering affordable housing and estate renewal.

**Better Homes for Local People The Mayor's Good Practice Guide to Estate Regeneration**

Sets out the Mayor's policies for Estate Regeneration.

**Relevant Local Plan (2012) Policies**

Barnet's Local Plan is made up of a suite of documents including the Core Strategy and Development Management Policies Development Plan Documents (DPD which

were both adopted on 11 September 2012. The Local Plan development plan policies of most relevant to the determination of this application are:

**Core Strategy (Adopted 2012):**

CS NPPF (National Planning Policy Framework – Presumption in favour of sustainable development)

CS1 (Barnet's Place Shaping Strategy – Protection, enhancement and consolidated growth – The three strands approach)

CS5 (Protecting and enhancing Barnet's character to create high quality places)

CS7 (Enhancing and Protecting Barnet's Open Spaces)

CS8 (Promoting a strong and prosperous Barnet)

CS9 (Providing safe, effective and efficient travel)

CS10 (Enabling inclusive integrated community facilities and uses)

CS11 (Improving health and wellbeing in Barnet)

CS13 (Ensuring the efficient use of natural resources)

CS15 (Delivering the Core Strategy)

**Development Management Policies (Adopted 2012):**

DM01 (Protecting Barnet's character and amenity)

DM04 (Environmental considerations for development)

DM05 (Tall Buildings)

DM14 (New and existing employment space)

DM13 (Community and education uses)

DM16 (Biodiversity)

DM17 (Travel impact and parking standards)

Supplementary Planning Documents and Guidance

The Council has a number of adopted Supplementary Planning Documents (SPDs) which provide detailed guidance that supplements policies in the adopted Local Plan, and sets out how sustainable development will be delivered in Barnet including generic environmental requirements to ensure that new development within Barnet meets sufficiently high environmental and design standards. They are material considerations for the determination of planning applications:

Colindale Area Action Plan 2010

The Colindale Area Action Plan sets out the Council's comprehensive but flexible long term strategy to manage change and deliver high quality sustainable development in Colindale.

Grahame Park Supplementary Planning Document 2016

The Grahame Park SPD provided site specific advice for the development of Stage B of the Grahame Park Estate.

Local Supplementary Planning Documents:

Sustainable Design and Construction (April 2013)

Planning Obligations (April 2013)

Barnet's Local Plan (Reg 22) 2021

Barnet's Draft Local Plan on 26th November 2021 was submitted to the Planning Inspectorate for independent examination which will be carried out on behalf of the Secretary of State for the Department of Levelling Up, Housing and Communities. This is in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2021 (as amended).

The Regulation 22 Local Plan sets out the Council's draft planning policy framework together with draft development proposals for 65 sites. The Local Plan 2012 remains the statutory development plan for Barnet until such stage as the replacement plan is adopted and as such applications should continue to be determined in accordance with the 2012 Local Plan, while noting that account has been taken of the policies and site proposals in the draft Local Plan limited weight has been given to the draft Local Plan in the determination of this application.

## 1.2 Key Relevant Planning History

<b>Application Ref.</b>	<b>Address</b>	<b>Description of Development</b>	<b>Decision and Date</b>
<b>W01731JS/04</b>	Grahame Park Estate - bounded by Lanacre Avenue to the west, Grahame Park Way to the south and Field Mead to the north.	Redevelopment of site involving the demolition of 1314 existing residential units and construction of 2977 new residential units providing a total of 3440 units on the estate, provision of approximately 9074sq.m replacement retail (Class A1), office (Class A2) food and drink (Class A3) and social and community (Class D1) uses and associated public and private open space, car parking and access arrangements. (OUTLINE) Submission of Environmental Statement.	APPROVED 17 <sup>th</sup> January 2007
<b>W01731LA/07</b>	PHASE 1A, Grahame Park Estate, Colindale London NW9	Reserved matters application seeking approval for design and external appearance in relation to Phase 1A, comprising 319 residential dwellings pursuant to condition 6 of outline planning permission W01731JS/04 dated 17-01-2007 for the redevelopment of Grahame Park Estate.	APPROVED 15 <sup>th</sup> January 2008
<b>W01731KW/07</b>	Land relating to Section 73 changes to Phase 1B, Grahame Park Estate, Colindale	Environmental Impact assessment - screening opinion.	Environmental Statement Not Required - 19 <sup>th</sup>



	London NW9		September 2007
<b>W01731LB/07</b>	Grahame Park Estate - bounded by Lanacre Avenue to the west, Grahame Park Way to the south and Field Mead to the north.	Section 73 application for variation to the approved phasing (amendment to phases 1A (Anson Block), 1B, and 4A) of the regeneration of Grahame Park Estate requiring the variation of conditions 4, 7 and 30 of Outline Planning Permission W01731JS/04 dated 17-01-2007.	APPROVED 9 <sup>th</sup> April 2008
<b>W01731KY/07</b>	Part of Grahame Park Open Space (Area within south eastern section) Bounded By Lanacre Avenue to the South and Quakers Course to the East, London NW9	Construction of single storey community facility to replace existing log cabin adventure playground, and associated landscaping and vehicle drop off.	APPROVED 11 <sup>th</sup> December 2007
<b>H/04448/10</b>	Grahame Park Estate - bounded by Lanacre Avenue to the west, Grahame Park Way to the south and Field Mead to the north, Colindale, NW9 5UP	Extension to the time limit for implementing planning permission W01731LB/07 granted 09/04/08 for "Section 73 application for variation to the approved phasing (amendment to phases 1A (Anson Block), 1B, and 4A) of the regeneration of Grahame Park Estate requiring the variation of conditions 4, 7 and 30 of Outline Planning Permission W01731JS/04 dated 17-01-2007.	Approved 16 <sup>th</sup> February 2011
<b>H/05110/10</b>	Grahame Park Estate, (Phase 1B of Regeneration), London NW9	Prior Notification for proposed demolition of buildings in relation to Phase 1B of the Regeneration of Grahame Park Estate comprising of 18 residential buildings of 1 to 4 storey brick and concrete flats, one single storey non-residential building and some separate garages.	Approved 18 <sup>th</sup> February 2011
<b>H/00308/11</b>	Grahame Park Estate, (Phase 1B of Regeneration), London NW9	Reserved matters application seeking approval for design, external appearance and landscaping for Phase 1B of the Grahame Park Estate Regeneration comprising 446 residential units (including Block A9), 5,483sq.m	Approved 21st February 2012

		(GEA) of non-residential floorspace including a library (Use Class D1), community centre (Use Class D1), supermarket (Use Class A1) and ancillary retail units (Use Classes A1, A2 and A3), pursuant to condition 6 of outline planning permission reference H/00309/11 for the regeneration of Grahame Park Estate, together with details of traffic management/highway improvements (condition 12) and phasing plans (condition 44) required to form part of the reserved matters, and details of the construction methods statement in order to discharge condition 46.	
<b>H/02522/13</b>	Grahame Park Estate, (Phase 1B of Regeneration), London NW9	Non material amendment to previously approved application Ref: H/00308/11 dated: 12/2/2012 for: Reserved matters application seeking approval for design, external appearance and landscaping for Phase 1B of the Grahame Park Estate Regeneration comprising 446 residential units (including Block A9), 5,483sq.m (GEA) of non-residential floorspace including a library (Use Class D1), community centre (Use Class D1), supermarket (Use Class A1) and ancillary retail units (Use Classes A1, A2 and A3), pursuant to condition 6 of outline planning permission reference H/00309/11 for the regeneration of Grahame Park Estate, together with details of traffic management/highway improvements (condition 12) and phasing plans (condition 44) required to form part of the reserved matters, and details of the construction methods statement in order to discharge condition 46. Amendments to include: change to sub-phasing of Phase 1B to create Sub-Phase 2 to allow for the delivery of the new Lanacre Avenue shift and Sub-Phase 3 for the delivery of Blocks A1, A8, B1 and	Approved 14 <sup>th</sup> August 2013

		B6.	
<b>H/00320/14</b>	Grahame Park Estate, (Plot A8)	Revised application for development of plot A8 consisting of a 5 storey building comprising a 5,536sq.m college, 500sq.m public library and 500sq.m centre for independent living (all Use Class D1); associated vehicle access, parking, landscaping, refuse and cycle storage (this is an amended proposal for the whole of this development plot, being proposed instead of the reserved matters approval reference H/00308/11 dated 21/02/2012 for 57 flats, a 750sq.m public library, 945sq.m centre for independent living and 279sq.m of retail floorspace).Amendments to include: change to sub-phasing of Phase 1B to create Sub-Phase 2 to allow for the delivery of the new Lanacre Avenue shift and Sub-Phase 3 for the delivery of Blocks A1, A8, B1 and B6.	Approved 6th May 2015
<b>H/04502/14</b>	Grahame Park Estate, (Plot B1)	Revised application for development of plot A8 consisting of a 5 storey building comprising a 5,536sq.m college, 500sq.m public library and 500sq.m centre for independent living (all Use Class D1); associated vehicle access, parking, landscaping, refuse and cycle storage (this is an amended proposal for the whole of this development plot, being proposed instead of the reserved matters approval reference H/00308/11 dated 21/02/2012 for 57 flats, a 750sq.m public library, 945sq.m centre for independent living and 279sq.m of retail floorspace).	Approved 6th May 2015
<b>14/07210/FUL</b>	Grahame Park Estate, (Plot B6)	Revised application for development of plot B6 comprising buildings between 1 and 6 storeys, to accommodate 92 residential units (84 flats and 8 dwellinghouses); associated vehicle access, highways, parking, landscaping, amenity space, refuse and cycle	Approved 15th July 2015

		storage (this is an amended proposal for the whole of this development plot, being proposed instead of the reserved matters approval reference H/00308/11 dated 21/02/2012 for 84 flats in a part 5, part 6 storey building).	
<b>15/04039/FUL</b>	Grahame Park Estate, (Plot A1)	Construction of a new council office building between 4 and 9 storeys in height providing 11,146 sq.m of floorspace comprising 10,646 sq.m of (B1) office space and 170sq.m of (A3) cafe and ancillary space on ground floor and basement. Provision of landscaping and public realm improvements, car and cycle parking and refuse and recycling stores. Amended Plans showing alterations to design of proposed council office building.	Approved 5th April 2016
<b>17/2840/OUT</b>	Grahame Park Estate, Plots 10, 11 & 12	Outline planning permission for the demolition of 630 existing residential units, Everglade GP Practice, Community Hall, library and retail units and the construction in three phases (plots 10, 11 and 12) of: 1083 residential units (use Class C3); a Community Hub of approximately 3,766 sq.m (GIA) comprising a community hall and workshop rooms, a daycare nursery, a GP Health centre, community health facilities and ancillary office accommodation (all use class D1) along with 186 sq.m (GIA) café (use class A3); approximately 340 sq.m (GIA) of retail space (predominantly use class A1, along with A2, A3, A4 and/or A5) ; a flexible ground floor space of approximately 55sq.m (GIA) (use class A1 or use class B1) within Block 10B; a new energy centre to provide district heating; and associated car parking, open space, landscaping and access arrangements. Within the outline application: - full details are submitted for the means of access, layout, scale, appearance and landscaping of	Refused 13/02/2018

		<p>Plots 10 and 12 and associated works; and</p> <p>- full details of Plot 11 are submitted for the means of access, layout, scale, appearance and landscaping with the exception of Plot 11D, where details of layout and scale are submitted, with means of access, appearance and landscaping reserved.</p>	
<b>19/5493/OUT</b>	Grahame Park Estate, Plots 10, 11 & 12	<p>Hybrid planning application for the demolition of 630 residential units and existing commercial, retail and community floorspace, and the phased redevelopment of Plots 10-12 of Grahame Park comprising a full planning application for the redevelopment of Plot A and an outline planning application for the redevelopment of Plots B to Q for up to 2,088 residential units and up to 5,950sqm (GEA) of flexible non-residential floorspace.</p> <p>Full planning permission is sought for the demolition of 113 existing homes and the redevelopment of Plot A comprising the erection of 5 buildings between 3 and 11 storeys to provide 209 new homes and 440sqm (GEA) of non-residential floorspace (Use Class A1, A2, A3, B1), landscape, public open space and public realm, associated car parking, cycle spaces and other associated works.</p>	Granted 31/07/2020

### **1.3 Pre-application Consultation by the Applicant**

The applicant has undertaken a comprehensive pre-application engagement strategy with key stakeholders in relation to the design development of Plots H and K and the proposed new section of Bristol Avenue, with specific consultation in relation to the design of the proposed community centre including:

- Pre-application meetings with officers and members at LB Barnet; and
- A consultation process with the local community including exhibitions, meetings, and workshops.

## **1.4 Public Consultations by the Council and Views Expressed**

### Public Consultation

**1342** local residents were consulted on the planning application by letter on 20.05.2022. The application was advertised in the local press on 26.05.2022 and site notices were put up on site on 26.05.2022. The consultation process carried out for this application is considered to be appropriate for a development of this nature. The extent of consultation exceeded the requirements of national planning legislation and the Council's own adopted policy.

### Public Representations

As a result of the consultation, a total of 24 responses have been received, all objecting to the proposals.

The comments received from members of the public have been summarised as follows:

### Summary of main points raised by members of the public in objecting to the scheme.

Density, scale and height of the proposal excessive and not in keeping with the area.

Loss of privacy and overlooking of neighbouring properties;

Loss of light and outlook to neighbouring properties due to the scale of the development.

Failure of Grahame Park and Douglas Bader schemes to consider impact on each other

Impact on access to Orion Nursery increasing walking distance.

Loss of parking spaces at time of increasing parking demand due to increased residential provision.

Impact on parking and congestion.

Property Devaluation

Plans Unclear

Excessive height and scale of proposed development at 14 storeys.

Will add to overcrowding and anti social behaviour

Insufficient infrastructure to support growth of population in Colindale in particular station capacity insufficient even it is expanded.

Impact upon mental health due to number of tall buildings (in Colindale)

Colindale becoming like a mini Canary Wharf rather than a suburb.

Insufficient green spaces.

Queries regarding proposed operation of CPZ and impact upon existing residents who utilise parking areas within the development as well as impact on adjoining areas.

Quantity of development excessive, insufficient affordable housing provided in this phase (25% Shared Ownership)

Percentage of single aspect units excessive

Prices in Colindale excessive.

Houses rather than flats should be built in Colindale.

Issues with flammable cladding (elsewhere in Colindale) should be solved before additional housing built.

Complaints about existing service to tenants and leaseholders by Notting Hill Genesis.

Impact of development on Green spaces, including the removal of trees and provision of managed over natural green space.

#### Officer Comment

All of the above representations have been taken into account in the officer assessment below. It is noted that the principle of the redevelopment of the site has already been established by outline planning approval 19/5493/OUT dated 31st July 2020.

#### **Elected Representatives.**

No Comments received

#### **Consultation responses from neighbouring associations other non-statutory bodies.**

No comments received

#### **Consultation Responses from Statutory Consultees**

##### **Transport for London (TfL)**

Thank you consulting Transport for London (TfL), we note the net increase in residential development is not significant.

We note the changes to the junction, and use of bus swept paths to assess changes to the design of the highway. We note the Stage 1 Road Safety Audit (RSA) and designers response.

We don't object to the Council approving this application.

The developers' team should continue to engage with TfL bus colleagues on the design of the highway where its used by buses. TfL would expect an updated Stage 1 RSA or combined Stage 1 and 2, when they bring forward the bus highway and bus stops. The design of bus stops should be based on TfL Bus Stop Accessibility Guidance.

If there is a target or agreed programme for the bus infrastructure works, it would be useful to see that.

##### **Health and Safety Executive (HSE)**

###### **1. Substantive response for the local planning authority**

1.1 Thank you for consulting HSE about this application.

1.2 It is noted that the above application is a Reserved Matters application in respect of Plots H and K (Phase 2) of the Grahame Park Estate respectively.

1.3 Plot H, includes two relevant buildings, block H1 and block H2, comprising thirteen storeys (43.5 m), and ten storeys (29.9 m).

1.4 Plot K, includes two relevant buildings, block K1 ten10 storeys (34.35 m) and block K2 six6 storeys (22.2 m).

1.5 The comments below and the substantive response headline are based on the information in the application including the fire statement, fire strategy, the floor plans and supporting documentation available on the planning register.

1.6 It is noted that the proposed relevant blocks will each be served by a single staircase. The single staircases constitute the only escape staircases, and only firefighting staircases serving dwellings on upper floors.

1.7 It is noted the fire strategy proposes, at the ground floor level, that “The **two stair exit passageways** are not connected to any residential corridors. **They are linked to the car park on ground floor via a lobby**. It is **proposed to provide mechanical ventilation in the lobby** (with suitable inlet of replacement air) to the lobby with the objective to prevent smoke from entering the exit passageways. This needs to be confirmed by computational modelling.”

1.8 However, fire safety standards state that, “*Where a common **stair forms part of the only escape route from a flat**, unless it is designated as a small single-stair building, it should not also serve any covered car park, boiler room, fuel storage space or other ancillary accommodation of similar fire risk.*” (BS 9991, Section 7, Clause 38). Accordingly, there should be no connection between the ancillary accommodation of higher fire risk and the single stairs in each block.

### **Scope of consultation**

**Means of escape**, including single staircases made vulnerable due to connection with ancillary accommodation including places of special fire hazard and areas of similar fire risk.

1.9 If a fire engineered solution is proposed, this should be identified on the fire statement form with an explanation of the alternative solution, demonstrating a level of safety equivalent to the fire standards.

1.10 Design alterations to separate the single staircases from ancillary accommodation is likely to affect land use planning considerations relating to design, layout and appearance of the development.

1.11 Measurements seen on the plan drawings provided suggest excessive travel distances of over 40m from the main entrance in the covered car parks. This would affect firefighting operations, due to hazards associated with controlling smoke and



firefighter safety. Fire safety standards state that firefighter travel distance should not exceed 30m in order to conduct rescue.

1.12 The British Standard relating to fire service intervention (PD7974-5) states: *“research shows that 34 m is the maximum distance fire-fighters should penetrate into a fire compartment to rescue a casualty, where no stair climbing is required to access the point of entry.”*

1.13 A fire in a covered car park is likely to present more onerous conditions for firefighter safety than a corridor. Indeed, fires involving electric vehicles may prove very challenging to extinguish over extended periods of time and will generate large volumes of smoke/gasses. This may result in physically demanding conditions for firefighters wearing breathing apparatus. Design changes necessary to ensure effective firefighting operations will affect land use planning considerations such as design, layout and appearance of the development.

### **Firefighting access and facilities.**

#### **2. Supplementary information for the applicant**

*The following points do not contribute to HSE’s overall headline response and are intended only as advice for the applicant. These comments identify items that could usefully be considered now to reduce the risk of making changes to the design at a later stage, which could have planning implications.*

2.1 Section 13 of the fire statement states that, *“the public hydrant system will be extended to incorporate the new development”*.

2.2 It is noted that the fire statement does not provide confirmation relating to the location of water supply for the development, yet recognises that additional private hydrants will be required. Resolving this issue may affect land use planning considerations relating to the landscaping around the building in the event that an additional hydrant is required.

2.3 It is noted in section 8 of the fire statement and from the roof plan drawings provided that PV panel installations are proposed on the roof of blocks H1 and K2. All power supplies, electrical wiring and control equipment should be provided with appropriate levels of protection against fire. Fire safety standards require suitable support of cabling to avoid obstruction of escape routes and firefighting access due to the failure of fixings.

2.4 It may be advisable to consider the risk to fire safety by the presence of the electric vehicles and cycles (EVs and ECs) in the covered car park and cycle stores because they contain lithium-ion batteries. Lithium-ion batteries may suffer thermal runaway and cell rupture, releasing large volume of toxic gases, heat and smoke before catching fire as well as afterwards. When they burn, a large amount of water is needed to flow on the batteries, however, fire keeps flaring up even after it appears to be extinguished. Furthermore, there is a danger of electrical shock for firefighters tackling a fire due to the high voltage used in EVs. Any consequent

design changes may affect land use planning considerations such as layout, appearance, and car parking provision of the development.

### Officer Comment

The Health and Safety Executive is not a statutory consultee as outline planning approval pre dated the relevant legislation. Nevertheless the applicant has advised that they intend to review and address the comments made by HSE and will address them as part of the detailed design, building control submission. An additional condition has also been attached to this recommendation requiring the submission of an amended fire safety strategy and the implementation of any measures incorporated within this strategy.

### **Thames Water (TW)**

#### Waste Comments

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C01%7CAndrew.Dillon%40Barnet.gov.uk%7Cc2a2573d6ac64a3d88a408da4d2466fd%7C1ba468b914144675be4f53c478ad47bb%7C0%7C0%7C637907115978311828%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=Ud%2Bk3f0mvdHedmhUQA%2F1PdAXYWbxhCUfxCwR96PR8ek%3D&reserved=0>

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement." Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C01%7CAndrew.Dillon%40Barnet.gov.uk%7Cc2a2573d6ac64a3d88a408da4d2466fd%7C1ba468b914144675be4f53c478ad47bb%7C0%7C0%7C637907115978311828%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=Ud%2Bk3f0mvdHedmhUQA%2F1PdAXYWbxhCUfxCwR96PR8ek%3D&reserved=0>

[%7C637907115978311828%7CUnknown%7CTWFpbGZsb3d8eyJWljoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6I1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&data=Ud%2Bk3f0mvdHedmhUQA%2F1PdAXYWbxhCUfxCwR96PR8ek%3D&reserved=0](#) Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk) Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Following initial investigations, Thames Water has identified an inability of the existing SURFACE WATER network infrastructure to accommodate the needs of this development proposal. Thames Water has contacted the developer in an attempt to agree a position for foul water networks but has been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. "The development shall not be occupied until confirmation has been provided that either:- 1. All surface water network upgrades required to accommodate the additional flows from the development have been completed; or- 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan." Reason - Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](http://thameswater.co.uk/preplanning). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing [trade.effluent@thameswater.co.uk](mailto:trade.effluent@thameswater.co.uk) . Application forms should be

completed on line via

<https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=05%7C01%7CAndrew.Dillon%40Barnet.gov.uk%7Cc2a2573d6ac64a3d88a408da4d2466fd%7C1ba468b914144675be4f53c478ad47bb%7C0%7C0%7C637907115978311828%7CUnknown%7CTWFPbGZsb3d8eyJWljoIMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IkhWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=0ufHg79rekdJRCj8K3h6v9XT89CNPqseb2TK6dC4o74%3D&reserved=0>. Please refer to the Wholesale; Business customers; Groundwater discharges section.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

#### Water Comments

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

#### Supplementary Comments

Surface Water: Thames Water has no objections to the proposed surface water discharges from Plot H, Plot K, and the Private Highways with a total discharge rate of 5.6l/s. Regarding the proposed adoptable highway section with an unattenuated discharge of 142.5l/s during a 1:30 rainfall event to the proposed diverted 900mm surface water sewer, this is a capacity concern for the receiving sewer. Additionally, there is no right to discharge highway drainage to the public sewerage system. Applying for Thames Water's consent to discharge runoff from an adopted highway under Section 115 would be a matter for the local authority adopting the highway, not the developer. Regardless of the application method, Thames Water would like to see significant improvement of this unattenuated discharge rate before considering accepting this flow from the adoptable highway section.

#### Officer Comment

Discussions are ongoing with Thames Water regarding the discharge of surface water from the proposed adoptable highway. A CCTV survey is to be undertaken which will confirm the existing highway drainage arrangement. Condition 24 of the outline planning consent requires a detailed surface water drainage strategy to be submitted and approved prior to the development of each phase of development and this has to include amongst other details agreement for the proposed discharge rates and discharge point for surface water sewer network with Thames Water. Further details will therefore be provided through the discharge of this planning condition.

## **Metropolitan Police Crime Prevention Design Advisor**

Although I do not have an objection to this planning submission, due to the crime levels within the local ward, historical and present-day issues with this estate and potential crime concerns by only applying some crime prevention measures but not others – I would respectfully request your consideration to apply a planning condition to any approval, whereby this development must achieve Secured by Design accreditation, prior to any occupation. I would recommend that this development achieves SBD Gold accreditation as this also includes external areas of public realm such as lighting and footpaths.

The commercial space must also be included under separate SBD accreditation and guidance for these buildings can be provided from the most recent SBD guide – 'Commercial 2015'.

I would also respectfully request the inclusion of a planning condition in relation to the implementation of a robust CCTV strategy for the public realm areas of this application. As an overt deterrent, this can help to assist with the prevention and detection of crime and disorder.

### Officer Comment

The absence of an objection is noted, a condition is attached to the outline approval requiring the submission of a crime prevention strategy prior to the occupation of any phase which is considered to satisfy the comments made by the Metropolitan Police Service.

## **English Heritage Archaeology**

Thank you for your consultation to GLAAS on 20 May 2022.

This site is not in an archaeological priority area, and although its size does make it consultable, there is no archaeological potential here due to the scale and impact of the previous developments.

No archaeological assessments or conditions are necessary.

## **Natural England**

No objections raised, reference made to standing advice.

### Internal Consultation responses

## **Urban Design**

No objections raised detailed comments incorporated in officer report below.

## **Environmental Health**

Submitted Environmental Statement (ES) Statement of Compliance is acceptable.

## Transport and Regeneration

No objections in principle raised to the scheme subject to appropriate conditions. Detailed comments incorporated in officer report below.

## Ecology

No objections to the findings and recommendations of the updated ecological report (ADAS 2022) as no significant changes have been reported onsite since the previous Preliminary Ecological Appraisal (ADAS 2019).

### Bats

The most recent ecological report (ADAS 2022) referred to individual and groups of trees that still possess suitability for roosting bats outlined in the Preliminary Ecological Appraisal (ADAS 2019) which will need to be inspected prior to felling. Since there has been a significant time lag since the original ground level tree assessment the updated ecological report has recommended **resurvey** (Ground Level Tree Assessment, GLTA) of TG3 (Rhus, Cherry and Whitebeam). This GLTA and any follow up inspections will be required prior to the commencement of works.

The recommendations for five bat boxes within the site (Photos H and K, Phase 2) was welcomed, however, it was noted that no design plans were submitted which highlighted the location and specification of the bat were submitted within the application. In addition, no work details were submitted on sensitive lighting strategy for bats e.g., on trees with bat roost potential or on the nearby Heybourne Park SINC. Further details on these will be required prior to commencement of works.

### Invasive Species

Wall cotoneaster is confirmed to be present on site. Previous ecological reports have recommended that *"If any wall cotoneaster is to be removed, any arisings containing this plant must be disposed of appropriately;"* However, no details have been provided as to bio secure methods of removal and disposal of the plant or the actions to be undertaken in the event other non-native plant species are discovered onsite.

### Landscape

It was noted that the current planting plans includes almost entirely non-native ornamental grasses, herbs and shrubs across Plot H & K. In contrast no specifications on the native species rich plantings were provided in the submitted landscape plans.

Further details will be required as to the planting specification, schedule and planting/seeding methods relating to the *wildflower - species rich grassland* and *shade tolerant wildlife – species rich grassland* referenced in Landscape GA Planting Plans (NHG-GPE\_HTA-L\_DR\_0902 Rev B) and Landscape GA Planting

Plans Plots H & K Podium (NHG-GPE\_HTA-L\_DR\_0924 Rev B).

This is required to determine whether the proposed planting is in accordance with the recommendation to include “*native species landscape planting to attract insects for foraging bats*” outlined in the Preliminary Ecological Appraisal (Campbell Reith, 2017) and reaffirmed in the updated ecological report (ADAS, 2022).

It is advised that the soft landscape plan for both GA Planting Plans and Landscape GA Planting Plans Plot H & K podium be amended to increase the proportion of native species rich shrubs and herbaceous plantings in relation to non-native species. This amendment will provide benefits to wildlife and help to ensure a net gain in biodiversity for the site.

### **Biodiversity Net Gain**

No biodiversity net gain assessment or calculation has been provided regarding the application. While we are in receipt of the details of soft landscaping and tree plantings which in theory would deliver a net gain in biodiversity, we are however, unable to determine the extent to which the proposed project will result in net gain in biodiversity without the BNG calculation and assessment.

### **Conditions:**

There are no significant ecological reasons to object to this application, however if it is likely to be recommend for approval of the reserved matters, or in the event of an appeal, the following conditions are suggested to obtain a more suitable development.

### **Ground Level Tree Assessment**

Prior to the commencement of works trees (TG3) which had previously been assessed as possessing low suitability for roosting bats a Ground Level Tree Assessment (GLTA) will be required to assess for potential bat roost features, this assessment can be conducted at any time of year but ideally in winter when trees are bare, and features are more visible by an experienced ecologist. If roost features are found, a follow-on climbing inspection to check for signs of bats will be undertaken. This climbing survey can be carried out between May and September.

### **Inspection and soft felling (bat roost feature)**

Prior the removal of those trees previously assessed as having low suitability for roosting bats (a group of cherries in a private garden (G181), a false acacia (T84), another false acacia within group G138), the trees are required to be climbed and the features inspected by a suitably trained ecologist with use of an endoscope. The features will be inspected to determine the presence or absence of any roosting bats that may be present. If no bats are recorded within the feature, then the tree can be declared of negligible concern for bats and be felled without delay. If a roosting bat is discovered, then works that would impact the tree must not take place until Natural England has been informed and the appropriate European Protected

Species mitigation licence has been obtained. For details on the soft fell method statement refer to Appendix 13 of the Preliminary Bat Report (Grahame Park Stage B (Plot 10, 11, and 12) London (ADAS 2017).

**Informative:** - Bats and their roost are strictly protected from damage or disturbance under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Section 42 of the Conservation of Habitat and Species Regulation 2017. Therefore, any activities which have the potential to impact a bat, or its roost will require appropriate mitigation and compensation under the auspice of a Natural England European Protected Species mitigation licence.

Pursuant to section 197 of the Town and Country Planning Act 1990 in accordance with local planning policy DM01 & DM16. Policies CS5 and CS7 of the Local Plan Core Strategy DPD (adopted September 2012), Policy G5, G6 & G7 of the London Plan and 2021 Environment Act 2021

### **Sensitive Lighting Strategy**

Prior to the commencement of works details of a Sensitive Lighting Strategy shall be submitted and approved by the local planning authority. Any artificial lighting scheme designed for project; including during the operational phase, shall be in accordance with Bats Conservation Trust Guidance Note 08/18 Bats and artificial lighting in the UK Bats and the Built Environment series. A detailed

Pursuant to section 197 of the Town and Country Planning Act 1990 in accordance with local planning policy DM01 & DM16. Policies CS5 and CS7 of the Local Plan Core Strategy DPD (adopted September 2012), Policy G5, G6 & G7 of the London Plan and 2021 Environment Act 2021

### **CEMP and Ecological Mitigation Strategy**

Prior to commencement of works a **Construction & Environment Management Plan (CEMP) for Biodiversity shall be submitted and approved by the planning authority**. Details within the CEMP shall include the following aspects: to ensure that habitats, species, and statutory and non-statutory designated site of nature conservation (as applicable) are adequately protected throughout all phases of the development in accordance with Legislation and policy. Details to protect species shall include within the Ecological Mitigation Strategy within the CEMP.

- i) **Ecological Mitigation Strategy (EMS)**. The document will outline the methods, responsibilities and timing for all mitigation affecting the protected/notable species (e.g., inspection of trees and soft felling of tree low suitability for bats, nesting birds) habitats and statutory and non-statutory designated sites of nature conservation (Heybourne Park). The details of the EMS will include information on the ecological features/species present, the potential impact risk of the works, and methods and time of avoidance, mitigation and remediation measures required before, during and after the works. The strategy will ensure



compliance with the mitigation hierarchy as described within BS4042: 2014 Biodiversity clause 5.2 Mitigation hierarchy.

Pursuant to section 197 of the Town and Country Planning Act 1990 in accordance with local planning policy DM01 & DM16. Policies CS5 and CS7 of the Local Plan Core Strategy DPD (adopted September 2012), Policy G5, G6 & G7 of the London Plan and 2021 Environment Act 2021

**Informative:** - In the event of a protected species being found works must stop and the project ecologist consulted, and the correct level of additional surveys and mitigation applied including any licences needed as referenced within Construction & Environment Management Plan (CEMP). Following the appropriate level of approval works may resume.

### **Invasive Species Management Plan**

Prior to the commencement of works details of an Invasive Species Management Plan A detailed plan showing the location of invasive species (Schedule 9 listed species Wildlife and Countryside Act 1980 (as amended) and Species of Concern under the London Invasive Species Initiative). In accordance with best practice and as directed by Ecological Mitigation Strategy these species shall treated or prevented from spreading out with the site.

Pursuant to section 197 of the Town and Country Planning Act 1990 in accordance with local planning policy DM01 & DM16. Policies CS5 and CS7 of the Local Plan Core Strategy DPD (adopted September 2012), Policy G5, G6 & G7 of the London Plan and 2021 Environment Act 2021

### **Biodiversity Net Gain**

- 1. Biodiversity Net Gain;** prior to commencement of works a Biodiversity Net Gain assessment and supporting plan that demonstrates biodiversity net gain including watercourses and details of landscape enhancements shall be submitted and approved by the local planning authority.
  - A. This document shall include details of habitat creation, enhancement measures for biodiversity gains using an appropriate DEFRA Biodiversity Metric calculator. This shall be incorporated into the scheme of the hard and soft landscaping, of the development. This scheme will include details of existing trees to be retained and size, species, planting heights, densities, positions of any soft landscaping, and habitat enhancements such as bird and bat boxes log piles etc appropriate to location shall be submitted to and agreed in writing by the Local Planning Authority prior to the occupation of the hereby approved development.
  - B. All work comprised in the approved scheme of landscaping and biodiversity enhancements shall be carried at the most optimal time wildlife and plantings. be all works must be completed within 12 months after occupation before the end of the first planting and seeding season and when most optimal for when following occupation of any part of the buildings or

completion of the development, whichever is sooner, or commencement of the use.

**Informative:-** No works shall be undertaken during outside of the species-specific activity period. Guidance can be found within BS 8683: 2021 *A process for designing and implementing biodiversity net gain* and BS42040:2013: Biodiversity – Code of practice for planning and development, and documents provided by the Chartered Institute of Ecology and Environmental Management (CIEEM) and the Royal Town Planning Institute (RTPI) for approval.

Pursuant to section 197 of the Town and Country Planning Act 1990 in accordance with local planning policy DM01 & DM16. Policies CS5 and CS7 of the Local Plan Core Strategy DPD (adopted September 2012), Policy G5, G6 & G7 of the London Plan 2021 and Environment Act 2021

### **Biodiversity, Landscape & Ecological Management Plan (30 years)**

1. Prior to the occupation of the hereby approved development, details of a Biodiversity, Landscape & Ecological Management Plan for all areas for a minimum period of 30 years have been submitted to and approved in writing by the Local Planning Authority.
  - a) The Biodiversity, Landscape & Ecological Management Plan shall include details of long-term design objectives, management responsibilities, maintenance schedules, replacement planting provisions for existing retained trees, and any new soft landscaping to be planted as part of the approved **Combined Biodiversity and Landscape Net Gain** scheme.
  - b) This management plan will ensure compliance with the approved level of biodiversity net gain for the approved development.
  - c) The approved Landscape Management Plan shall be implemented in full in accordance with details approved under this condition.
  - d) The approved management plan shall detail habitat creation, enhancement measures (including the location and specifications of the recommended bat boxes) and required monitoring of the habitats and species affected by the project. This would need to be commiserate with any Biodiversity Net Gain Plan for the site in order to avoid any redundancies.

Pursuant to section 197 of the Town and Country Planning Act 1990 in accordance with local planning policy DM01 & DM16. Policies CS5 and CS7 of the Local Plan Core Strategy DPD (adopted September 2012), Policy G5, G6 & G7 of the London Plan and 2021 Environment Act 2021.

#### Officer Comment

Biodiversity enhancement, tree protection and landscaping conditions were attached to the outline permission. An additional ecology condition plus informative

is however attached to address the comments of the Council's ecology officer.

### **Capita Drainage (Lead Local Flood Authority)**

Comments provided in relation to the scheme. Final details to be agreed subject to a future discharge of condition application pursuant to the outline application.

## **2. DESCRIPTION OF THE SITE, SURROUNDINGS AND PROPOSAL**

### **2.1 Site Description and Surroundings**

Grahame Park is the borough's largest housing estate, originally comprising 1,777 units of mostly social rented accommodation, along with a small neighbourhood shopping centre and various community facilities. The estate suffers from a number of socio-economic and physical problems. A tenant's participation survey in 1999 identified a number of issues including the poor physical environment and poor image, unsafe and difficult circulation routes owing to the Radburn style separation of vehicles and pedestrians, overcrowding and inappropriate occupancy for large families, a high turnover of stock, poorly placed and poorly integrated local facilities and poor levels of shopping choice.

Grahame Park estate itself comprises a mixture of flats and houses, in buildings of varying heights and set in areas of open space. The central area, known as the Concourse, comprises mainly 5-7 storey apartment blocks and also contains almost all of the retail and community facilities. 4 and 5 storey apartment blocks extend to the north and south of the Concourse, whilst the remaining accommodation is generally 2-3 storey houses and flats. The main area of open space is known as Heybourne Park (formerly known as Grahame Park Open Space) which is located to the west of the Concourse, whilst other areas of informal open space exist between buildings.

In 2003 residents voted in favour of a full regeneration of the estate and in 2004 an outline planning application was submitted for the redevelopment of the Estate involving the demolition of 1,314 existing residential units and construction of 2,977 new residential units providing a total of 3,440 units on the estate along with replacement retail, office, food and drink, social and community uses, associated open space, car parking and new access arrangements (planning permission ref. W01731JS/04) which was granted permission in 2007.

Following the approval of the outline planning application a number of reserved matters applications were approved for the redevelopment of the parts of the estate to the west of Heybourne Park and at the southern end of the Estate (known as Stage A) comprising 685 new homes. This part of the redevelopment also included retail uses, a new library and office space for Barnet Council.

As mentioned above this masterplan became out of date and a subsequent application planning application reference (19/5493/OUT) was submitted in 2019 and approved in July 2020 for the redevelopment of Plots 10, 11, 12 (Stage B) of the Estate. Plots H & K the subject of the current reserved matters application are located to the southern part of the approved illustrative masterplan and within the

existing Plot 12 and comprise part of Stage 2 of Phase B of the regeneration proposals for Grahame Park.

The immediate site surroundings are mixed in character. To the north and west of Grahame Park Estate are low-density, predominantly 2-3 storey residential estates, ranging from 1970s to schemes currently under construction or recently completed, as well as the Blessed Dominic School. To the south of the estate are Middlesex University student halls of residence, with blocks ranging between 3 and 4 storeys and the residential development known as Beaufort Park. Immediately to the east of the estate is Colindale Police Station, St James' School and the RAF Museum.

Colindale Underground Station, on the Edgware branch of the Northern Line, serves the immediate area and is located some 400m from the southern edge of the estate. The site is well served by the strategic road network, with good access to the A5 to the west and the A41/A1 to the east. The borough boundary with the London Borough of Brent runs along the A5, whilst the M1 and the Thameslink railway form the eastern boundary of the CAAP area.

## **2.2 Description of the Proposed Development**

The Proposed Development is as follows:

*Reserved Matters application seeking approval of, layout, scale, appearance, access and landscaping in respect of Plots H and K (Phase 2) of the Grahame Park Stage B Regeneration pursuant to Conditions 7, 10, 12, 28 and 44 attached to hybrid planning permission reference 19/5493/OUT dated 31st July 2020, involving the erection of buildings ranging between 3 and 14 storeys high comprising of 364 residential dwellings and flexible commercial space (Use Class E), a housing office (Use Class E), community centre (Use Class F2(b)), energy centre, public open space and public realm, car parking spaces, cycle parking spaces, refuse storage space, construction of part of Bristol Avenue and other associated works. The application is accompanied by an Environmental Statement of Compliance*

## **3. PLANNING CONSIDERATIONS**

### **3.1 Environmental Impact Assessment**

An Environmental Statement (2019 ES) was approved as part of the hybrid planning permission.

An Environmental Statement (ES) Statement of Compliance has been submitted in support of this RMA. The purpose of the ES Statement of Compliance is to demonstrate that the environmental assessment provided in the 2019 ES is adequate in order to assess the environmental effects of the RMA, and that no further information is required under Regulation 22.

In order to demonstrate that the findings of the 2019 ES are still valid in the context of this RMA, the ES Statement of Compliance submitted with the RMA has taken into account the following:

- Changes to the baseline conditions;
- Consistency with the specified parameters and indicative scheme;
- Effects that were not identified or identifiable at the outline stage;
- Incorporation of mitigation identified at the outline stage; and
- Any further relevant information.

The ES Statement of Compliance concludes that the progression of the project via the reserved matters application is compliant with the 2019 ES.

### **3.2 Principle of Development**

The principle of constructing 364 residential dwellings, commercial space and community centre etc on the site is established by the hybrid/outline planning permission 19/5493/OUT.

The reserved matters currently under consideration as per condition 10 of the hybrid permission are relates to details of layout, scale, landscaping and appearance:

**Scale** – the height, width and length of each building proposed in relation to its surroundings.

**Layout** – the way in which buildings, routes and open spaces are provided within the development and their relationship to buildings and spaces outside the development.

**Appearance** – the aspects of a building or place which determine the visual impression it makes, excluding the external built form of the development.

**Landscaping** – this is the treatment of private and public space to enhance or protect the site's amenity through hard and soft measures, for example, through planting of trees or hedges or screening by fences or walls.

**Access** – The internal road layout was established at outline stage. This current application shows roads in the same location in compliance with the outline parameters for access.

The 'outline' element of the hybrid planning permission provided for a series of parameter plans which establishes a series of parameters and principles to create a clear framework of planning control and fix the quantum of development, land uses, levels and access arrangements.

The key parameter plans of relevance to the consideration of this application are:

- Site Location Plan (ref: HP-PTA-MP-ZZ-DR-A-0100)
- Existing site layout and demolition (ref: HP-PTA-MP-XX-DR-A-0101)
- Development plot plan (ref: HP-PTA-MP-XX-DR-A-0102)
- Development phasing plan (ref: HP-PTA-MP-XX-DR-A-0103)
- Horizontal limits of development plots (ref: HP-PTA-MP-XX-DR-A-0105)
- Vertical limits of development plots ref: HP-PTA-MP-XX-DR-A-0106)
- External ground levels (ref: HP-PTA-MP-XX-DR-A-0107)
- Access and circulation plan (ref: HP-PTA-MP-XX-DR-A-0111)
- Horizontal boundary restrictions on development plots (ref: HP-PTA-MP-XX-DR-A-0112)

The proposed reserved matters application accords with the maximum parameter thresholds established under the above plans.

### **3.3 Design**

#### **Height, Bulk, Scale and Massing**

Barnet Core Strategy defines tall buildings as buildings of 8 storeys or 26m and states that they may be appropriate in strategic locations subject to detailed assessment criteria.

Policy D9 of the London Plan 2021 state that tall buildings should be part of a plan-led and design-led approach, incorporating the highest standard of architecture and materials and should contribute to improving the legibility and permeability of an area, with active ground floor uses provided to ensure such buildings form an appropriate relationship with the surrounding public realm. Tall buildings should not have an unacceptably harmful impact on their surroundings in terms of their visual, functional, environmental and cumulative impacts, including wind, overshadowing, glare, strategic and local views and heritage assets. Policy D9 states that tall buildings should only be developed in locations that are identified as suitable in development plans.

The submitted RMA proposal broadly aligns with the illustrative principles as specified under the outline/ hybrid planning framework.

#### Elements in full accordance with outline planning framework.

- Plot H aligns with the strategy within the Outline Permission and incorporates:
  - A marker element with more storeys in the north west corner (Block H1) than elsewhere in the masterplan;
  - A background building with fewer storeys in the south west corner (Block H2); and
  - Low rise, three storey buildings in the east (Blocks H3 and H4) which respond to adjacent existing low level buildings.

Plot K aligns with the strategy within the Outline Permission and incorporates:

- a taller element in the west (Block K1); and
- a lower element in the east (Block K2) that responds to adjacent existing context

The heights of all plots and buildings sit within the Parameter Envelope defined in the Outline Permission.

#### • Amendments from the Approved Parameters

- Building H1 is a total of G+13 storeys. The consented outline heights parameter allowed for G +12 storeys with a plant enclosure on top. Due to design developments a plant enclosure is not needed and a residential storey is incorporated in its place.

- Building K1 is a total of G+11 storeys including the plant enclosure level. The podium height and ground floor non residential uses have been optimised to facilitate an additional residential storey within the approved volume; and
- Building K2 is a total of G+7 storeys which includes a mezzanine floor incorporated into the height of the podium where non residential height at grade is not required.

The proposed departures from the approved site wide parameters are considered acceptable by officers as they do not exceed the AOD building heights approved under the outline approval making use out of space within the approved volumes. It is therefore considered that proposed scale, height and massing is appropriate and successfully responds to the site constraints and opportunities, emerging context and neighbouring properties.

### Detailed Design

The National Planning Policy Framework (published 2012) makes it clear that good design is indivisible from good planning and a key element in achieving sustainable development. This document states that permission should be refused for development which is of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. It identifies that good design involves integrating development into the natural, built and historic environment and also points out that although visual appearance and the architecture of buildings are important factors, securing high quality design goes beyond aesthetic considerations.

The London Plan 2021 policy D1B requires development to respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and be of high quality, with architecture that pays attention to detail, and gives consideration to the use of use of attractive, robust materials which weather and mature well. Policy D2 (Delivering good design) requires masterplans and design codes to help bring forward development and ensure it delivers high quality design.

Policy CS5 of Barnet Council's policy framework seeks to ensure that all development in Barnet respects local context and distinctive local character, creating places and buildings of high quality design. In this regard Policy CS5 is clear in mandating that new development should improve the quality of buildings, landscaping and the street environment and in turn enhance the experience of Barnet for residents, workers and visitors alike. Policy DM01 also requires that all developments should seek to ensure a high standard of urban and architectural design for all new development and high quality design, demonstrating high levels of environmental awareness of their location by way of character, scale, mass, height and pattern of surrounding buildings, spaces and streets. Proposals should preserve or enhance local character and respect the appearance. Policy DM03 seeks to create a positive and inclusive environment that also encourages high quality distinctive developments. The above policies form the basis for the assessment on design.

The two plots are located in the masterplan area to the south of the concourse with Plot K at the bottom of the development site and H located a bit further to the north beyond Block L which will be the subject of a future reserved matters application. The character of the western edge of both of these plots adjoin the more urban nature of the central avenue down the re-configured Bristol Avenue, while on the eastern edge the development adjoins the proposed woodland walk and the lower suburban form of houses retained outside the application site boundary.

The application responds to this typology with larger apartment blocks along the western edge, and a lower rise block on the eastern edge of plot K and town houses on the eastern edge of plot H facing the proposed woodland walk and St Margaret church. The proposed community centre is located in the centre of these two blocks in plot K.

In terms of the materiality both the proposed houses and apartment buildings will be predominately brick built with some changes to materials within buildings to add contrast and the buildings gradually transitioning from a buff brick to darker brick moving north along the new Bristol Avenue. Banding is also included in the taller apartment blocks facing towards Bristol Avenue to provide contrast. Balconies are proposed to be bronze coloured as are the commercial frontages and louvres. A distinctive base is proposed to the blocks containing commercial units to delineate the different uses and to add articulation to the building.

Overall officers consider that the proposals represent a high quality of design and materiality in keeping with the character and appearance of the area and the future adjoining phases which will come forward in future phase. The proposals demonstrate a building design and layout in broad accordance with the Illustrative Masterplan and is considered to achieve the requirements of Policies CS5 and DM01.

#### *Archaeology*

English Heritage have written to the Council advising them that there are no archaeology constraints on the site and as such it is considered that there are no archaeology constraints arising from the proposals.

### **3.4 Development Quantum**

#### *Housing Quantum and Mix including Affordable Housing*

Condition 7 attached to the outline approval sets out the maximum number of residential units (2088) and the maximum floorspace for non residential uses including community uses permitted as part of the hybrid planning permission across the masterplan area.

Development Plan policies require proposals to provide an appropriate range of dwelling sizes and types, taking account of the housing requirements of different groups to address the housing needs in Barnet (See policy DM08). The Council's Local Plan documents identify 3 and 4 bedroom units as being of the highest priority



types of market housing for the Borough. The need for a diverse range of units sizes is also echoed within London Plan H10.

The proposed unit and tenure break down of the current reserved matters application is as follows:

**Table 1: Proposed Accommodation Schedule Plot H**

Size	Shared Ownership	Private	Total
	Units	Units	Units
Studio	0	20	20
1-Bed	45	45	90
2-Bed	38	52	90
3-Bed	2	12	14
<b>Total</b>	<b>85</b>	<b>129</b>	<b>214</b>

**Table 2: Proposed Accommodation Schedule Plot K**

Size	Shared Ownership	Private	Total
	Units	Units	Units
Studio	0	39	39
1-Bed	0	43	43
2-Bed	0	62	62
3-Bed	0	6	6
<b>Total</b>	<b>0</b>	<b>150</b>	<b>150</b>

**Table 3: Proposed Accommodation Schedule Plots H and K**

Size	Shared Ownership	Private	Total	
	Units	Units	Units	%
Studio	0	59	59	16.2%
1-Bed	45	88	133	36.5%
2-Bed	38	114	152	41.8%
3-Bed	2	18	20	5.5%
<b>Total</b>	<b>85</b>	<b>279</b>	<b>364</b>	<b>100%</b>
<b>%</b>	<b>23.4%</b>	<b>75.6%</b>	<b>100%</b>	

The proposed residential accommodation for both plots therefore provides: 23.4% affordable housing by unit (24.1% habitable room) in Block H2, comprising '85 "shared ownership units' along with 279 private units within both plots H and K.

Account does however need to be taken of the context of the outline/ hybrid overall which provided for 50% affordable housing (by both habitable room and floorspace): 346 social rent/affordable rent and 699 shared ownership homes. It is also noted that Plot A approved in detail under the hybrid approval and under construction provided for 100% of the units within this phase to be affordable and with early delivery of social rent units to aid the scheme's decant strategy. As such the total percentage of units approved (or proposed under this reserved matters application to date) equal 51.3% affordable homes taking Plots A, H and K together. On this basis the proposed unit mix for this phase is considered acceptable being in accordance with the site wide unit schedule. It is noted that due to the nature of the scheme some phases will have more private and some phases more affordable units (included rented units) and the configuration of this phase is considered acceptable in this context.

## Non Residential Floorspace

The proposal incorporates the following non residential floorspace each of which is discussed in turn below.

**Table 5.4: Proposed Non- Residential Floorspace**

Use	GIA	GEA
Commercial	264 sqm	301 sqm
Commercial Ancillary	26 sqm	31 sqm
Community Centre	859 sqm	901 sqm
Community Centre Ancillary	38 sqm	44 sqm
Housing Office	166 sqm	178 sqm
Service	834 sqm	881 sqm
Car Park	1,723 sqm	1,739 sqm
Service (Comm)	265 sqm	272 sqm
<b>Overall Total (without service space)</b>	<b>1,353 sqm</b>	<b>1,455 sqm</b>
<b>Overall Total (with service space)</b>	<b>4,175 sqm</b>	<b>4,347 sqm</b>

### **Community Centre**

The existing community centre on the Concourse is c.309sqm which will be demolished as part of the application proposals. As such it was a requirement that a replacement community centre is provided as part of the Grahame Park regeneration.

The new community centre will be located on Plot H within the centre of the Grahame Park redevelopment along the proposed central north-south spine road of Bristol Avenue in accordance with the approved parameters of the hybrid planning permission. The new community centre will be 897sqm which exceeds the floorspace of the existing community centre. In addition to the increase in floor area, the proposed community centre is designed to provide a much higher quality and flexible accommodation than the existing community centre.

The design of the new community centre has been drawn up following extensive consultation with local groups including the Colindale Community Trust who operate the existing facility and are intended to take on the management of the new facility.

The community centre has been designed to provide a modern and flexible space that can accommodate a range of uses that will meet residents' needs and those of local community groups, and will also be financially sustainable.

The new community centre will provide flexible spaces to accommodate a range of different types of events such as group training, flexible workspace, specialist

spaces, small group training/meeting space and smaller office spaces.

In accordance with the requirements of the s106 agreement pursuant to the hybrid planning permission, a 'New Community Centre Scheme' and "New Community Centre Specification" are submitted concurrently with this RMA the content of which has been discussed with the Council's Regeneration Team who have advised that the submitted details are acceptable.

### ***Retail***

London Plan (2021) policy E9 advises that development proposals should support convenience retail in local and neighbourhood centres, to secure inclusive neighbourhoods and a sustainable pattern of provision where there is less need to travel. Local Plan policies CS6 and DM12 also seek to enhance and protect local neighbourhood shopping facilities, preventing the loss of retail uses unless there are accessible alternative shopping facilities; it meets a local need and there is no demand for the continued A1 use. The Council's policy DM12 identifies Grahame Park as a local centre, with number 1-21 The Concourse designated as a local shopping frontage.

The proposed development will deliver replacement retail/cafe uses on the Site in line with the approved uses in the hybrid planning permission contributing to the replacement of the neighbourhood centre on The Concourse which is to be demolished. The proposals will create a higher quality of retail space and the creation of new jobs locally that will meet the objectives to protect, enhance and support neighbourhood centres and local convenience shops in accordance with the Grahame Park SPD, Local Plan policies CS6 and DM12, London Plan (2016) policy 4.8, and London Plan (2021) policy E9.

### **Housing Office**

The hybrid planning permission included provision for up to 1,000sqm of flexible B1 employment space at ground floor level along the proposed north-south central spine road. In accordance with this, the current proposals under this reserved matters application propose the inclusion of a new housing office for Notting Hill Genesis in Plot H along the central north-south road. This is considered acceptable by officers in accordance with the outline permission and would also enable residents on the estate to more easily contact the housing association regarding any issues with either accommodation, the construction or the wider regeneration programme.

### **3.5 Quality of Accommodation**

London Plan (2021) policy D6 requires new homes to have adequately sized rooms and convenient and efficient room layouts which are functional and fit for purpose,

to meet the changing needs of Londoners without differing between tenures. The London Plan incorporates the National Described Space Standards. Draft Local Plan policy CDH01 also requires development to be in accordance with the standards of the London Plan.

All homes in Plots H and K will meet the minimum floorspace criteria defined in the Technical Housing Standards – Nationally Described Space Standard. All units will also comply with standards in the London Plan at policy D6 for bedroom sizes, bathrooms/WC's and storage and utility.

London Plan (2021) policy D5(C), Draft Local Plan policy CGH01, Grahame Park SPD and LBB's Sustainable Design and Construction SPD seek to maximise the provision of dual aspect units and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of London Plan (2021) policy D1 than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation daylight and privacy and avoid overheating.

A total of 46.2% dual/triple aspect homes and no north facing single aspect homes are proposed. The Daylight and Sunlight report (discussed later in this report) demonstrates that the proposed homes will still have good levels of daylight/sunlight and aspect and is considered acceptable by officers in this instance.

London Plan (2021) policy SI 4 require major development proposals to demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance. An Overheating Analysis was submitted as part of the Energy assessment demonstrating that all apartments have an acceptable risk of overheating in line with the GLA's requirements. Further mitigation in the form of passive measures is proposed in relation to all dwellings most 'high risk' which is considered an appropriate response.

#### *Disabled Units/Access*

A total of 37 wheelchair M4(3) homes (10%) will meet Building Regulations requirement M4(3) and all remaining units will meet Building Regulations Requirement M4(2) in accordance with Local Plan policy DM03, London Plan (2021) policy D5 and Condition 37 of the hybrid planning permission. The M4(3) homes are a mixture of 1-bedroom and 2-bedroom units and are distributed across the blocks in grouped stacks at lower levels to provide ease of access.

#### *Sunlight and Daylight to Proposed Units*

The application is accompanied by a Daylight/Sunlight report which provides an assessment of the potential impact of the development on sunlight, daylight and overshadowing to neighbouring residential properties and the proposed units based on the approach set out in the Building Research Establishment's (BRE) 'Site Layout Planning for Daylight and Sunlight: A Good Practice Guide'.

Daylight has been assessed in terms of Vertical Sky Component (VSC) and sunlight has been assessed in terms of Annual Probable Sunlight Hours (APSH) and overshadowing has been assessed against the above BRE guidelines. The BRE Guidelines provide numerical guidelines, however these are not mandatory and should not be seen as an instrument of planning policy, these (numerical guidelines) are to be interpreted flexibly since natural lighting is only one of many factors in site layout design.

Daylight: the BRE Guidelines stipulate that there should be no real noticeable loss of daylight provided that either:

*The Vertical Sky Component (VSC) as measured at the centre point of a window is greater than 27%; or the VSC is not reduced by greater than 20% of its original value. (Skylight); or*

*The daylight distribution, as measured by the No Sky Line (NSL) test where the percentage of floor area receiving light is measured, is not reduced by greater than 20% of its original value.*

It should be noted that the London Plan guidance states that in view of London's context accepting VSC reductions exceeding 20% is acceptable.

Sunlight: the BRE Guidelines confirm that windows that do not enjoy an orientation within 90 degrees of due south do not warrant assessment for sunlight losses. For those windows that do warrant assessment it is considered that there would be no real noticeable loss of sunlight where:

*In 1 year the centre point of the assessed window receives more than 1 quarter (25%) of annual probable sunlight hours (APSH), including at least 5% of Annual Winter Probable Sunlight Hours (WSPH) between 21 Sept and 21 March – being winter; and less than 0.8 of its former hours during either period; and In cases where these requirements are breached there will still be no real noticeable loss of sunlight where the reduction in sunlight received over the whole year is no greater than 4% of annual probable sunlight hours.*

The Internal Daylight Report submitted with the RMA, concludes, there will be acceptable levels of natural light for future occupants in the proposed development. Of the 355 rooms assessed, 312 achieve or surpass the daylight requirements for their room use providing an 88% compliance rate. A total of 90% of rooms assessed meeting their ADF target value in the 'as built' position.

It is considered that this level of compliance on a scheme of this scale is considered acceptable and that the proposed development accords with relevant development plan policies.

Private Amenity Space

The Mayor's Housing SPD and London Plan (2021) policy D6 require a minimum of 5 sqm of private outdoor space for all 1-2 person dwellings and an extra 1sqm for each additional occupant.

Barnet's Sustainable Design and Construction SPD sets the minimum standards for outdoor amenity space provision in new residential developments. Flats are expected to provide 5sqm of usable outdoor communal or private amenity space per habitable room proposed and houses considerably more as detailed in Table 2.3 below of SPD Adapted from the Sustainable Design and Construction SPD and are as per the London Plan requirements. For both houses and flats, kitchens over 13sqm are counted as a habitable room and habitable rooms over 20sqm are counted as two habitable rooms for the purposes of calculating amenity space requirements.

Table 2.3: Outdoor Amenity Space Requirements	Development Scale
<b>For Flats:</b> <ul style="list-style-type: none"><li>• 5 m<sup>2</sup> of space per habitable room.</li></ul>	Minor, Major and Large scale
<b>For Houses:</b> <ul style="list-style-type: none"><li>• 40 m<sup>2</sup> of space for up to four habitable rooms</li><li>• 55 m<sup>2</sup> of space for up to five habitable rooms</li><li>• 70 m<sup>2</sup> of space for up to six habitable rooms</li><li>• 85 m<sup>2</sup> of space for up to seven or more habitable rooms</li></ul>	Minor, Major and Large scale

Draft Local Plan policy CDH07 in the Reg 22 for flats repeats the standards in the London Plan and for houses repeats the standards in the Mayor's SPD.

All dwellings in Plots H and K will have access to private amenity space that complies or exceeds the minimum standards set out in London Plan policy D6 and the principles set out in the hybrid planning permission through the provision of balconies, private terraces and gardens. A total of 1,969 sqm of private amenity space is provided in Plot H and 1,079 sqm in Plot K (total of 3,048 sqm of private amenity space).

A majority of homes have private amenity space in the form of balconies. First floor apartments bounding the west side of podium gardens are provided with private terraces which are raised slightly from the podium level to provide separation and additional privacy. All dwellings on the top floor of Plot H2 also benefit from residential terraces. Each town house benefits from a terrace garden where access is provided to the shared podium gardens. Additional amenity space in the form of gardens is provided fronting east onto the woodland walk at ground level, and the two south facing ground floor maisonettes within Building H2 also benefit from at grade gardens.

All homes with ground floor access benefit from private amenity space and/or gardens at grade which is buffered appropriately from the public realm without impacting upon views and visibility of public spaces.

### *Communal Amenity Space*

There is no specific minimum requirement for communal amenity space provision in the London Plan. The Mayor's Housing SPG requires communal open space to be accessible to disabled people including people who require level access and wheelchair users. Communal amenity space will be provided across the proposed development in multiple forms in accordance with the principles set out in the hybrid planning permission. A total of 4,219 sqm of communal amenity space is provided in the form of communal gardens, podiums, a play street, a community garden and Woodland Walk.

Access to the communal gardens will be step free via the communal core and available to all residents within each Plot including ground floor homes. All access points to the courtyards will be provided with accessible thresholds of suitable width.

### *Play space*

London Plan Policy S4 requires housing development to make provisions for play and informal recreation based on child yield, referring to the Mayor's SPG Shaping Neighbourhoods: Play and Informal Recreation 2012.

London Borough of Barnet Core Strategy Policy CS7 requires improved access to children's play space from all developments that increase demand, and Policy DM02 requires development to demonstrate compliance with the London Plan.

The play strategy for the masterplan area has been developed to all relevant standards and approved in the hybrid planning permission. Child play space is distributed across the masterplan area with larger offerings in Heybourne Park for all ages. The hybrid planning permission establishes a minimum of 9,150sqm of playspace to be provided across the masterplan area within a mix of semi private and public areas.

The level of children's play space required for Plots H and K is 1,230.6 sqm based on the GLA calculator. In line with the hybrid planning permission play strategy, the total child yield is broken down into bands of ages with proportional percentages applied to them (under 5's – 30%, 5-11's – 40%, and 12+ – 30%). A total of 375 sqm of under 5's child play space is provided across the two plots in communal courtyards with a further 100 sqm provided outside the future nursery opposite the Plot H community centre entrance, and a further 330 sqm within the east west play to the north of Block K (a total of 800sqm) in accordance with the provisions in the masterplan. This exceeds the requirement for Plots H and K of 370sqm for the benefit of future phases. In accordance with the proposals in the illustrative masterplan, playspace for the over 5's is to be provided within Heybourne Park, the proposals for which are being led by the Council.

## **3.6 Landscaping**

Condition 10 requires inter alia details of proposed landscaping to be submitted with each reserved matters application. In line with this, detailed landscape plans have been submitted with the application along with a landscape strategy is contained within section 8 of the DAS.

In summary, the proposed development of Plots H and K incorporates a comprehensive landscaping strategy that will introduce landscaped podiums, public spaces, and planting along Bristol Avenue and the Woodland Walk, including a mixture of hard and soft landscaping and buffer treatments.

The landscape proposals at ground floor have been designed to provide a new accessible, clear, navigable, pedestrian and cycle friendly green streets and open spaces. Greening through the retention of existing trees, provision of new tree planting, swales, rain gardens and species rich planting creates an incredibly diverse, rich and green public realm. The street hierarchy, character areas and range of public open spaces have been derived from the principles set out in the masterplan for the hybrid planning permission.

Key areas of public realm have been focused around the community facilities. In particular, community focused flexible outdoor space directly linked to the east of the community centre in Block H allows for opportunities for flexible use such as community events, community growing etc.

The public realm is designed to provide flexibility as well as maximising soft landscape, whilst also creating clearly defined public and private open spaces. Opportunities for informal spill out have also been provided within the street scape.

One of the strategic goals of the approved masterplan is to create green streets where pedestrians are in constant contact with open green spaces, trees or planting. This is achieved partially by the inclusion of trees and low level planting in all streets, but also via the design of the edges to the residential amenity areas at ground floor. These include generous soft landscape zones on the public side of the boundaries which create a continuous strip of green livery surrounding the Plot. This strategy has been taken a step further through creating a semi continuous series of planted rain gardens/swales that run along the eastern side of Bristol Avenue.

The landscape proposals for the first-floor courtyards have been designed to meet the needs of residents of all ages and a range of uses. This includes play areas for under 5's, passive, and quiet spaces, viewing points with seating, generous planting buffers to allow privacy to private terraces on the communal courtyards, and opportunities for community growing by the provision of raised beds.

The site will achieve an urban greening factor of over 0.4 as required by London Plan (2021) policy G5.

The proposed development seeks to deliver a net gain in the number of trees on the Site, and retain as many of the existing high value trees as possible as well as new varied tree planting. The existing category A London Plane trees along the Woodland Walk will be largely retained to reinforce the Woodland Walk character as set out in the approved masterplan.

A lighting strategy will be implemented in line with the hybrid planning permission. The lighting strategy will be designed to create a safe and legible environment whilst enhancing the public realm and creating safe and walkable streets and public open



spaces. Full details will be submitted for approval prior to the occupation of Plots H and K in accordance with Condition 39 of the hybrid planning permission.

### ***3.7 Impact on Neighbouring Amenity***

At a national level, Chapter 11 of the NPPF has an approach based on the central principle of sustainability through the pursuit of amenity improvements, developments driven by context, long term improvements to the environment and high quality design.

Under the Local Plan, the protection of existing amenity arrangements in any area is considered to be an important aspect of determining whether a proposal is acceptable or otherwise. The protection of existing residential amenity is required through good design in new developments which intern promotes quality environments. More specifically Policy DM01 states that proposals should seek to manage the impact of new developments to ensure that there is not an excessive loss of amenity in terms of daylight/sunlight, outlook and privacy for existing occupiers.

This is further supported by Barnet's Adopted Residential Design Guidance SPD (adopted April 2013) which provides further guidance on safeguarding the amenities of neighbouring and surrounding residential occupiers.

#### ***Privacy, overlooking and outlook***

Policy DM01 of Barnet's local plan requires development proposals to be designed to allow for adequate privacy and outlook for adjoining and potential occupiers and users. The Barnet Residential Design Guidance SPD provides more detailed guidance and states that there should be a minimum distance of 21 metres between properties with facing windows to habitable rooms to avoid overlooking, and 10.5 metres to a neighbouring garden. Shorter distances may be acceptable between new build properties where there are material justifications.

London Plan (2021) policy D1 (London's form and character and capacity for growth) further explains that development proposals should deliver appropriate outlook, privacy and amenity. The Council's Supplementary Planning Document Residential Design Guide recommends minimum distances between habitable room windows and to neighbouring gardens to protect privacy.

The Design Guidelines approved by the hybrid planning permission provide a number of rules that govern the sub-division of Plots, including a minimum separation distance of 18m between any residential building and other buildings with facing windows whether within the proposed masterplan or adjacent existing context. With the exception of one minor deviation at first floor level between Buildings H1:H3 and H2:H4 – see 4.9.1 in the DAS, the proposals for Plots H and K maintain this minimum distance between the development plots. This deviation is only 0.2m and is a result of the position of the town houses at the most easterly setting in order to ensure minimal incursion onto the route protection areas of existing trees on the Woodland Walk.

As per the parameters established by the hybrid planning permission there will be an absolute minimum separation distance of 18m between facing windows in buildings that form part of the proposed development and windows in buildings that surrounding the application site. Again, the proposals for Plot H and K maintain this distance.

Overall, it is considered that the development is more than compliant with the required policies governing loss of privacy, outlook, overshadowing and overlooking to any future neighbours when taken in the context of the Outline consent.

#### *Daylight, sunlight and overshadowing*

A Daylight and Sunlight Report has been submitted with the application to assess the daylight/sunlight amenity on surrounding residential properties following the redevelopment of the Site. The Daylight and Sunlight report demonstrates that retained levels of amenity to neighbouring properties will remain good post development. In terms of daylight, 96% of the total number of windows assessed retain above the suggested 15% VSC target (established as an appropriate level given its urban context in the outline/ hybrid approval). In terms of sunlight amenity, the APSH analysis confirms that almost all the surrounding rooms orientated within 90 degrees of due south retain above the suburban 25% APSH target for sunlight.

In terms of overshadowing, the proposed amenity spaces will experience sufficient direct sunlight. During the March equinox, 5 of the 7 amenity spaces assessed are compliant with the BRE guidelines as they enjoy 2 hours of direct sunlight to over 50% of their area. The communal nature of the space suggests that the amenity is most likely to be used during the summer months, thus when the June solstice assessment is undertaken, the results provide that each of the 7 amenity spaces enjoy 2 hours of direct sunlight to 85% to 100% of the amenity area.

When the Daylight and Sunlight report is compared to the Daylight and Sunlight report of approved masterplan, there is no material difference between the proposal regarding daylight, sunlight or overshadowing.

In light of the above, the proposed sunlight and daylight impact on existing residential units is acceptable.

### **3.8 Trees and Biodiversity**

Policy DM01 requires that proposals should include hard and soft landscaping that:

- Is well laid out in terms of access, car parking and landscaping.
- Considers the impact of hardstandings on character.
- Achieves a suitable visual setting for buildings.
- Provides appropriate levels of new habitat including tree and shrub planting.
- Contributes to biodiversity including the retention of existing wildlife habitat and trees.
- Adequately protects existing trees and their root systems.

- Makes a positive contribution to the surrounding area.

DM01 further states that trees should be safeguarded and when protected trees are to be felled the Council will, where appropriate, require replanting with trees of an appropriate size and species. This is also supported by the Barnet Local Plan Policy DM16, which elaborates that when considering development proposals, the Council will seek the retention, enhancement or creation of biodiversity.

London Plan (2021) policy G7 sets out that wherever possible, existing trees of value are retained. If a planning permission necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed and the planting of additional trees should be included in new developments – particularly large-canopied species which provide a wider range of benefits.

The masterplan approved under the outline/ hybrid approval proposed a vehicular route to the east of Plot H, which would have resulted in the loss of a significant number of category A trees. This route has been amended under the current reserved matters application and will now be a shared pedestrian and cycle route which allows for the majority of these trees to be retained which is welcomed.

As part of the proposals for Plots H and K, 31 trees are to be retained and 68 are to be removed. The RMA proposals seek to retain 2 more trees than was originally proposed in the hybrid planning permission within the RMA boundary. Furthermore, the proposals retain a greater proportion of higher category A trees than the hybrid planning permission proposed (9 more overall). The proposals for Plots H and K and the surroundings have sought to retain as many mature existing trees within the streets and central greenspaces as possible and have integrated the play facilities within the trees.

The proposals aim to deliver an overall net gain in the number of trees on the Site, including retaining as many of the existing high value trees as possible, as well as new, varied native tree planting. The existing category A trees along the Woodland Walk will be largely retained helping to reinforce the Woodland Walk character as set out in the hybrid planning permission. Tree planting proposals will focus on the implementation of street trees, and new 'groups' of a variety of species which are disease resistant and drought tolerant. Specimen trees will also be selected to retain the character and habitat of the current landscape once mature trees begin to decline and need to be removed.

The landscaping proposals also incorporate the planting of over 100 new trees across the development of Plots H and K.

Overall, the proposed tree retention and planting strategy is considered acceptable representing a qualitative and quantitative improvement over the outline/ hybrid approval.

## **Biodiversity**

London Plan (2021) policy G6 requires development proposals to manage impacts on biodiversity and aim to secure biodiversity net gain.

An Ecological Assessment was submitted with the hybrid planning application which concluded that the areas of habitat recorded were considered to have negligible ecological value due to poor species diversity, isolated location, and high level of disturbance from vehicles. The site was considered to be suitable for supporting common breeding birds and low numbers of roosting bats in four trees on the site. A number of recommendations were provided to protect birds during construction and increase the biodiversity of the site.

An Ecology update was undertaken and submitted with the current reserved matters applications. The conclusions of the report was that the Site had not changed since the previous report. Recommendations include the provision of five bat boxes across the site and native species landscape planting. The Landscape section of the DAS provides details of the proposed landscape across the Site and details of the locations of proposed bat boxes which will increase biodiversity. A high level assessment of the landscape proposals has been undertaken which confirms that the proposals will deliver a biodiversity net gain of at least 10% in accordance with London Plan policy G6, and Local Plan policy CS7.

A suitable additional ecology condition is also included in the recommendation to address any concerns of the Council's ecology officer. The outline consent includes a condition to achieve maximum biodiversity enhancements of this phase.

### **3.9 Drainage**

Local Plan policy CS13, DM04 require development to utilise SUDs, aim to achieve greenfield run off rates and ensure that surface water run-off is managed as close to its source as possible in line with the drainage hierarchy set out in the policy. Drainage should be designed and implemented in ways that deliver other policy objectives of the Plan, including water use efficiency and quality, biodiversity, amenity and recreation. Similarly, London Plan policy SI13 replicates much of the adopted policy requiring development proposals to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the drainage hierarchy detailed in the policy.

A Site Wide Drainage Strategy was approved as part of the hybrid planning permission which included separate surface and foul water networks. For this it was proposed that a foul water network would be laid out to serve the buildings in each phase and would be connected to the diverted/existing sewer. It is proposed to attenuate the surface water flows to greenfield run off rates before discharging to the public sewer via various SuDS methods including rainwater harvesting, trench planters, swales and permeable surfaces which will also provide other benefits such as enhancing biodiversity and urban greening.

The drainage strategy for Plots H and K proposes to attenuate surface water runoff from the two Plots separately before a controlled release to the public sewer. In accordance with the hybrid permission drainage strategy, attenuation for Plots H and K has been calculated based on the 1 in 100 year plus 40% climate change return period and is proposed to be in the form of below ground cellular storage crates. Controlled rates to the public sewer are proposed to be limited to the 1 in 1 year greenfield run-off rate from Plot H, K and the private highway.

The use of SuDS planters (bio-retention) and permeable paving has also been proposed on the Plots. Where applicable it is proposed to allow private footway runoff to run directly into the SuDS planters before entering the below ground piped system. Private highways are proposed to outfall to the below ground system via permeable paving located in parking bays. Bio-retention facilities are proposed at podium level on Plots H and K, it is proposed that these areas are used for treatment only and are allowed to free drain to the private below ground network.

The proposed highway west of Plots H and K (Bristol Avenue) is proposed to be offered for adoption, and as such surface water runoff from this highway is proposed to outfall to the diverted public sewer or to a proposed highway drainage system. There is a future section of Bristol Avenue that does not fall within the RMA boundary. However, the diverted sewers and highway drainage proposed in this section of Bristol Avenue have been included in the drainage strategy as enabling works. The catchment for the enabling works section of Bristol Avenue has also been included in any calculations relating to the adoptable highway catchment.

Foul Water is proposed to outfall via gravity to the diverted foul water public sewer. It is proposed Plot H and K will have separate foul systems catering for their respective Plots only.

The submitted information has been assessed by the Capita Drainage team who for statutory purposes are the Lead Local Flood Authority (LLFA). The LLFA have requested additional information and clarification regarding the proposed drainage strategy including evidence of consent from third parties regarding discharge. Following a meeting on 15<sup>th</sup> November between the applicant and the LLFA it was agreed that any outstanding matters could be dealt with by means of a future discharge of condition application of Condition 24 attached to the Outline Consent and as such no objections were raised to this application being reported to committee on this basis.

### **3.10 Wind**

London Plan (2021) policy D9 and Local Plan policy DM05 requires the impact of wind conditions around buildings and neighbourhoods to be carefully considered and not compromise the comfort and enjoyment of open spaces around the building and in the public realm.

A Wind Microclimate Assessment was submitted with the hybrid planning application which assessed the microclimate conditions around existing and proposed buildings in the illustrative masterplan including the maximum parameters of buildings proposed for Plots H and K. It demonstrated that the proposed

development shown in the illustrative masterplan would not result in major impacts in terms of wind microclimate as a result of the development. There would be no safety failings due to wind, and all pedestrian areas would be suitable for all uses during the summer months.

A Wind Microclimate Wind Assessment has been submitted with the RMA to assess the impacts of the buildings proposed for Plots H and K. It demonstrates that the wind conditions in and around the site are expected to be suitable for the intended use with the proposed minor mitigation measures in place. The proposed development is therefore compliant with London Plan (2016) policy 7.6Bd, London Plan (2021) policy D9, Local Plan policy DM05 and draft Local Plan policy CDH04.

### **3.11 Air Quality**

The Site is located within the Borough wide Air Quality Management Area (AQMA). The Environmental Statement of Compliance submitted with this RMA concludes that the scheme is compliant with the Air Quality Assessment approved under the hybrid planning permission and will be Air Quality Neutral. The proposed development is therefore compliant with Local Plan policy DM04c, London Plan (2016) policy 7.14, and London Plan (2021) policy SI1.

### **3.12 Noise**

The Environmental Statement of Compliance submitted with this RMA concludes that the scheme is compliant with the Noise Assessment approved under the hybrid planning permission. The proposed development is therefore compliant with Local Plan policy DM04d, London Plan (2016) policy 7.15 and London Plan (2021) policy D1.

### **3.12 Sustainability**

At the heart of the NPPF is the fundamental principle to build in favour of sustainability. It states that developments should reduce greenhouse gas emissions and in determining planning applications local planning authorities should expect developments to comply with local policies in terms of the layout of development, paying particular attention to create developments that would reduce energy consumption through building orientation, massing and landscape.

London Plan Policy SI 2 Minimising greenhouse gas emissions requires development proposals to make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

- Be lean: use less energy
- Be clean: supply energy efficiently
- Be green: use renewable energy

London Plan Policy SI 2 requires all residential developments to achieve zero carbon on new residential developments of which a minimum on-site reduction of at

least 35 per cent beyond Building Regulations is required for major development. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough through a cash in lieu contribution to the borough's carbon offset fund.

Condition 28 of the hybrid planning permission requires that details of the energy supply for each building in the relevant development plot shall be submitted as part of RMA's for all development plots. Details must be in accordance with the Energy Statement unless otherwise agreed and shall include:

- Details of the energy supply for each building connections, including a statement of compliance with the Energy Statement;
- Details of any temporary energy provision required; and
- Details of the safeguarded provision for connections to an area wide heat network if feasible.

Pursuant to condition 28 an Energy and Overheating Assessment for the development of Plots H and K has been submitted demonstrating compliance with the principles of the Energy Strategy approved as part of the hybrid planning permission.

No temporary energy provision is required for the Site during the construction process. A safeguarded single point of connection will be provided to the plot K energy centre, ensuring that a future connection to an area wide heat network is feasible.

### **3.13 Highways**

Policy CS9 of the Barnet Core Strategy (Providing safe, effective and efficient travel) states that the Council will promote the delivery of appropriate transport measures to relieve pressure on the existing infrastructure and support growth, whilst maintaining the level of freedom in terms of public access to these facilities. The Council is also driven by the objective to ensure that any proposed use or development would match the current transport capacity and capabilities at the local. If necessary these will be undertaken via the use of the Community Infrastructure Levy or S106 Legal Agreements. In doing so, the following measures will be prioritised:

- The reduction congestion
- Continued investment in the highways network
- Working with TFL
- The management of parking
- Maintaining road safety
- Encouraging sustainable modes of transport

Policy DM17 states that the Council will ensure that there is safety for all road users and will refuse applications that may lead to safety concerns on the highway or increase risk to vulnerable users. In considering new developments the Council will require the submission of a Transport Assessment where the proposed

development is anticipated to have significant transport implications. Developments should be located close to existing public transport links and should encourage their use and if necessary, new routes and services should be created. Cycle and parking provisions should be proposed in line with the London Plan standards.

A full Transport Assessment and Healthy Streets Assessment was submitted with the outline/ hybrid planning application and the masterplan scheme was considered to be acceptable by officers and members in transport and highways terms subject to s106 obligations for improvements to local public transport, local pedestrian and cycle routes and other local highways works and planning conditions requiring details of a Site Wide Sustainable Transport Strategy and Car Parking Strategy and then further details to be submitted for each plot.

### **Access and Movement**

Vehicular access to the off-street car parking areas of Plot H will be facilitated via two access points provided at Gauntlet Street (to the south of Plot H) and Hudson Street (to the north of Plot H) retrospectively. Vehicular access to the off-street car parking areas of Plot K will be facilitated via an access point provided at Percival Avenue (to the south of Plot K). All access points of both plots will have adequate waiting space for vehicles to access/ egress the internal/ off-street car parking areas and will be secured with gates being electronically controlled.

The Reserved Matters proposal generally complies with the high level parameters identified in the approved parameters centred around a repositioned Lanacre Avenue along the west of the site acting as a primary circulation route alongside a secondary trafficked circulation route running north- south to the east of Plot K (and the future Plot L) and stitches an access route into the existing Percival Avenue in the south.

However, the scheme makes some minor deviations along the east of Plot H. Previously in the outline permission this was envisaged as a vehicular route, while in the current reserved matters application this has been altered to a pedestrian/ cycling route only in order to allow for the retention of additional mature London Plane trees and to improve the pedestrian environment around the block. These proposed deviations are considered acceptable by officers and the scheme as a whole is considered acceptable in this regard.

A temporary access layout is also proposed and shown on the approved plans to allow for the construction of the development while maintaining access to surrounding properties and local bus routes. The details of this temporary route has been assessed by Council Highway officers who have advised that the submitted details and routes are considered acceptable subject to detailed approval under highway legislation.

### **Trip Generation and Impact**

London Plan (2021) policy T4 requires the cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, to be taken into account and mitigated. Local



Plan policy DM17 also expects major development proposals with the potential for significant trip generation to be in locations which are, or will be made, highly accessible by a range of transport modes.

In terms of the proposed development's impact on the existing highway and to comply with condition 44 of the outline consent, the Transport Statement submitted with the RMA concludes that the development of Plots H and K represents a modest change in traffic generation from the existing occupied dwellings which are to be removed from the development. It is therefore not considered necessary to provide any further assessment of network traffic conditions in respect of the development of Plots H and K.

## **Car Parking**

London Plan (2021) policy T6 states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. The maximum car parking standards should be applied to development proposals. For 3% of dwellings at least one designated disabled persons bay per dwelling should be available at the outset. Development should also demonstrate how an additional 7% of dwellings could be provided with one designated disabled space per dwelling in the future upon request.

As part of the hybrid planning permission, it was accepted that a car parking ratio of up to 0.41 spaces per residential unit would be proposed across the masterplan. A total of 134 car parking spaces are proposed across Plots H and K (76 for Plot H and 58 for Plot K). These will be located off-street at podium level and on-street (on adopted and private roads). This includes 1 car club space next to Plot K.

In terms of visitor parking, residents eligible for the proposed bespoke CPZ on adopted street space are able to apply for up to 200 visitor vouchers per year. It will also be possible for the private areas to have controlled visitor parking through the Parking Management Company. For other visitor requirements it is proposed that the on-street spaces on Bristol Avenue will be identified as both resident permit and pay-by-phones. This will allow some short-term parking within the area without encouraging short car trips within the development.

As per the hybrid planning permission, the commercial land uses will be car-free with the exception of two disabled car parking space for non-residential users (one for Plot H and one for Plot K).

In line with London Plan (2016) and condition 49 of the hybrid planning permission across Plots H and K at least 20% of residential car parking spaces (27 spaces) will have active charging facilities with another 20% (27) of spaces having passive provision. The spaces with active charging facilities are proposed to be located on-street at various locations surrounding the plot, while the spaces with passive provision will be located within the off-street car parking areas of the plot.

The residential disabled car parking is also provided at 3% (13 spaces) with the ability to provide up to 10% (33 spaces) if required. Further details of car parking

spaces can be found on the submitted drawings and in the DAS.

Planning condition 49 of the hybrid planning permission requires a Car Parking Management Plan to be submitted and approved by LBB prior to the first occupation of the development. This is required to be in line with the Site Wide Strategy and include full details of car parking spaces, on-site parking controls, enforcement details of unauthorised parking, disabled spaces, location of car club space and electric vehicle charging points. A Car Parking Management Plan has been prepared and was submitted concurrently with the RMA to discharge the requirements of condition 49 of the hybrid planning permission which is currently pending consideration however comments have been received from the highway department advising that they are supportive of the management plan in principle and the level of car parking proposed.

The proposed level of car parking is therefore considered appropriate in line with policy and the parameters of the outline planning approval.

### Loss of Public Car Park

Concerns have been raised about the loss of existing parking spaces, including the loss of the temporary car park, known as the 'Hundred Acre Car Park' that is understood to be used by some existing residents and visitors on the Grahame Park Estate. This car park has always been a temporary meanwhile use during this phase of the regeneration following the earlier demolition of parts of the Estate. The approved Grahame Park masterplan has been in the public domain since early 2019 and this clearly shows the development of Plot K in the location of this car park.

Furthermore, previous masterplans for the regeneration of the entire estate have shown buildings and landscaping in the area currently being used as the car park. Notably, plans for the RMA for Phase 1B (land to the south of Percival Avenue), that was approved in February 2012 identified the land being use for the car park as 'Temporary Car Park Location'.

Given these factors it is considered that the loss of the temporary car park is acceptable given that planning permission has already been granted for development on this site and due to the temporary nature of the approval.

### Public Transport

The use of public transport as set out in the site-wide strategy is encouraged through improvements to bus connections. This phase installs the infrastructure for the future realignment of bus routes through Grahame Park. New bus stops are proposed at strategic positions to support community, workplace and retail uses.

A future bus stop has been incorporated in front of the Community Centre (Plot H). This will become operational during a subsequent phase, i.e. once the north-south route in front of Plots H, K and L are completed and traffic re-directed from the N:S stretch of Lanacre Avenue. In the interim the bus route along Lanacre Avenue and bus stop in Quakers Course shall continue to be operational with safe routes to and from these maintained.

## Cycle Parking

London Plan (2021) policy T5 requires development to provide appropriate levels of cycle parking which should be secure, well-located and laid out in accordance with the guidance contained in the London Cycling Design Standards.

The proposed layout of Plots H and K incorporates a cycling network enabling cyclists to safely travel through the overall site of the masterplan. The tertiary roads will provide east-west links for cyclists crossing the Site, whilst the primary and secondary route will provide a north-south link to the existing network. The cycle facilities will follow the delivery of the roads for each phase of the overall development of the masterplan.

A key element of cycle infrastructure will be the delivery of the main north south road to create a central spine (Bristol Avenue). Bristol Avenue will accommodate the primary north south cycle route.

Cyclists will also be able to use the secondary cycle route via the Woodland Walk area, to the east of both plots.

In accordance with policy T5 of the London Plan, a total of 663 cycle space will be provided across Plots H and K:

- 374 residential in Plot H;
- 259 residential in Plot K;
- 18 non-residential in Plot H (5 long stay and 13 short stay); and
- 8 non-residential in Plot K (2 long stay and 6 short stay).

In addition to the non-residential cycle provision at Plots H and K, 4 additional non-residential and 'on-street' visitor cycle spaces are proposed at the public realm surrounding both plots.

Overall, the level and configuration of the proposed cycling provision is considered acceptable, in accordance with policy requirements and the parameters of the outline planning consent.

### **3.8 Refuse and Recycling Storage**

Under Policy CS14 of the Local Plan Core Strategy, the Council has taken a proactive approach to dealing with waste production and disposal. It notes that a key component of dealing with waste in a more sustainable way is to find better ways of reducing the amount of waste and taking more responsibility for its disposal.

In keeping with the above, Policy CS14 encourages sustainable waste management practices for all developments by way of waste prevention, re-use, recycling, composting and resource efficiency over landfill. All developments should seek to present waste disposal techniques which are able to meet future needs. The Sustainable Design and Construction SPD provides a detailed minimum requirement for waste provisions stating that *"All non-residential developments should provide a minimum of 10m<sup>2</sup> designated waste storage space for materials*

*for recycling, such as paper, glass bottles and jars, cans, cardboard, and plastic bottles” (p.30) and “A minimum internal storage capacity of 60 litres per dwelling (flats and houses) should be provided which can accommodate containers for the temporary storage of materials to be recycled.” (p.30).*

Details of the proposed refuse and recycling strategy have been submitted with the planning application, the content of which appears acceptable. The final details of the refuse strategy will be subject to a future discharge of condition application.

#### **4. EQUALITY AND DIVERSITY ISSUES**

Section 149 of the Equality Act 2010, which came into force on 5th April 2011, imposes important duties on public authorities in the exercise of their functions, including a duty to have regard to the need to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;*
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.*

For the purposes of this obligation the term “protected characteristic” includes:- age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

Officers have in considering this application and preparing this report had regard to the requirements of this section and have concluded that a decision to grant planning permission for this proposed development will comply with the Council's statutory duty under the above legislation.

#### **5. CONCLUSION**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the Council to determine any application in accordance with the statutory development plan unless material considerations indicate otherwise. All relevant policies contained within The Mayor's London Plan and the Barnet Local Plan, as well as other relevant guidance and material considerations, have been carefully considered and taken into account by the Local Planning Authority in their assessment of this application.

As conditioned, the proposal would not compromise the outline planning permission (19/5493/OUT) for the redevelopment of the wider site. It accords with the relevant development plan policies, conforms to the design principles and the parameters established in the approved outline application for the Grahame Park Estate.

The proposal is acceptable on design, visual amenity and archaeology grounds. The proposal would not significantly affect the amenities of neighbouring residential properties. It would provide for much needed quality family housing that would have

a good standard of accommodation including outlook, privacy and access to daylight.

The design of the development is considered appropriate for its location, which also provides for variety and legibility in Built Form. The materials and form relates well to the surrounding development. The layout of the development provides permeability around the site as well as to the wider development.

It is recommended that the application be **Approved** subject to the attached conditions.

**SITE LOCATION PLAN: Grahame Park, London NW9**

**REFERENCE: 22/2599/RMA**

