

The London Borough of Barnet (Grahame Park Regeneration Area) Compulsory Purchase Order 2022

Witness Statement for Andrew Dillon MRTPI

7th February 2023

Contents

- 1. Introduction 1
- 2. Background to the Scheme, The Next Phase and Planning Permissions in Respect of It..... 3
- 3. Conditions and Section 106 Controls 8
- 4. Compliance with the Adopted Planning Policy Framework and Benefits of The Development Proposed For
The CPO Land 11
- 5. Absence of Planning Impediments to the Development of the CPO Land.....35
- 6. Highway Stopping up Orders36
- 7. Objections to the Scheme37
- 8. Conclusion38
- 9. Declaration39

Appendices

Appendix I s106 Agreement

1. Introduction

Qualifications and Experience

- 1.1 My name is Andrew Dillon BA (Hons) DipTP MRTPI.
- 1.2 I am the Planning Manager of the Major Projects Team at Regional Enterprises Ltd, and have been a chartered member of the Royal Town Planning Institute since 2001. I have been employed in local government as a Planning Officer within Development Control/Management for 20 years with my primary role being responsible for the processing and determination of planning applications. I have worked at the Council and then Regional Enterprises Ltd since August 2013.
- 1.3 I am an employee of Regional Enterprise Ltd (Re). Re is a joint venture between London Borough of Barnet ("the Council") and Capita. Set up in 2013, Re carries out a variety of services on behalf of London Borough of Barnet, including Planning, Highways and Regeneration. Employees of Re provide services usually carried out by Council officers in areas such as planning and regeneration, reporting to senior commissioning officers within the Council and providing advice and recommendations to elected members. In respect of the statutory planning function of the Council, I prepare officers reports and make recommendations in respect of planning applications received by the Council for proposals within their area. I am authorised to give my evidence to the Inquiry on behalf of the Council.
- 1.4 On the 1st of April 2023 the joint venture will come to an end and I will return to being a direct employee of the Council.
- 1.5 The Major Developments Team deals with the larger and more complex planning submissions received by the London Borough of Barnet ("the Council"), including regeneration schemes and developments of a strategic nature to the Borough and the wider region.
- 1.6 As such I provide reports and advice as the planning officer to assist with strategic level decision making for large scale major developments and regeneration schemes. I have been the Planning case officer responsible for administering planning functions and duties associated with the regeneration of the estate since 2015 from a Development Management perspective.
- 1.7 I have a good understanding of the Order Land within the wider context of the regeneration of the estate and the relevant planning policy issues.
- 1.8 My evidence will address:
- Background to the Scheme, the Next Phase & Planning Permissions in respect of it
 - Conditions and Section 106 Obligations

- Compliance with the Adopted Planning Policy Framework and Benefits of the development proposed for the CPO land
- Absence of Planning Impediments to the Development of the CPO Land
- Highways Stopping Up Orders
- Absence of Planning Impediments to the Development of the CPO Land
- Objection to the Order

2. Background to the Scheme, The Next Phase and Planning Permissions in Respect of It

- 2.1 Grahame Park Estate is the largest council housing estate in the borough. Plan 1 of the Book of Plans shows the original Estate. 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 suffered from serious decline and socio-economic problems over the years.
- 2.2 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. The estate is set out on a north-south alignment, fronting onto a central pedestrian walkway, with open parking courtyards on the periphery. A central pedestrianised shopping precinct, known as the Concourse, was created in the centre of the estate, where the majority of the remaining retail and existing community facilities are currently situated. The main area of open space, Heybourne Park (formerly known as Grahame Park Open Space) is located to the west of the Concourse, whilst other areas of informal green space and amenity land open space exist between buildings. (Plan 3 of the Book of Plans)
- 2.3 Other issues identified were overcrowding and inappropriate occupancy for large families, a high turnover of stock, the Concourse being poorly placed and poorly integrated with local facilities and offering a 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.
- 2.4 The regeneration of the Estate is being delivered as two stages, Stage A and B ("the Scheme"). Stage A has been completed (Plan 2 of the Book of Plans) and delivery of Stage B (Plan 3 of the Book of Plans) has commenced with the demolition of part of Plot 10, (Sub-Plot A). The Order is sought to assemble the land for the remaining part of Plot 10, Plot 11 and 12 (Plan 4 of the Book of Plans). The delivery of the remaining part of Stage B (plots 13 to 21) is part of potential future development or renewal/infill, with the delivery timescale to be determined. Photographs of the existing estate within the Order Land are included in Section 2.6 of Part 2 of the Design and Access Statement (CDB.3.02).
- 2.5 An outline planning permission (reference W01731JS/04 ("the Outline Masterplan") was granted on the 31st January 2007 for the delivery of the Scheme as two stages, Stage A and B. All of Stage A has been completed (Plan 3 of the Book of Plans) with a total 685 new homes having been delivered, of which 52% are affordable (235 social rent, 38 affordable rent and 81 intermediate).

- 2.6 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.
- 2.7 The Outline Masterplan was agreed by all parties to have become out of date due to the passage of time and policy changes and was no longer viable for Stage B of the redevelopment as set out in paragraph 1.26 page 7 of Mr Smith's Witness Statement. An updated approach to the regeneration of the estate was therefore needed, and the Council decided that – given the long-term nature of the project – a planning framework with greater flexibility than an outline permission was required. the Council 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 the Council, with Mae Architects leading the master planning and design elements of the SPD. This SPD was subject to Public Consultation and was adopted in July 2016 **(CDF.4)**.
- 2.8 The SPD **(CDF.4)** is a material consideration in the planning process for all applications affecting the Estate. The SPD **(CDF.4)** sits below Barnet's Local Plan Core Strategy **(CDF.2)** and Development Plan Document **(CDF.3)**, as well as the Colindale Area Action Plan (CAAP) **(CDF.10)** which is an earlier document setting the spatial framework for the development of the wider Colindale Area adopted in March 2010 following extensive public consultation.
- 2.9 Following the completion of the SPD **(CDF.4)** 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.'*
- 2.10 The London Borough of Barnet resolved in November 2017 to grant planning permission subject to referral to the Mayor of London.
- 2.11 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.*
- 2.12 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.
- 2.13 The application was subsequently refused on the 13th February 2018 in accordance with the Mayoral direction.
- 2.14 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.
- 2.15 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'(Plan 8 of the Book of Plans)*
- 2.16 The application and accompanying documents were reported to the Strategic Planning Committee Meeting of the 2nd 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 subsequently received and concluded and the planning permission was subsequently issued on the 31st July 2020 (**CDB.1**). Work on the redevelopment of Plot A (detailed element) has started on site.

- 2.17 The planning application was accompanied by a daylight/sunlight assessment (**CDB.4.01 AND CDB.4.02**). The Daylight and sunlight assessment assessed the impact of both the detailed element of the Plot A and also the masterplan outline elements for the remainder of Plot 10, 11 and 12 based on the maximum parameters applied for.
- 2.18 The detailed part of Plot A identified properties to the west of this plot as being the main affected properties. The majority of windows in these properties would retain Vertical Sky Component ("VSC") compliant levels of daylight and in relation to sunlight, all of the surrounding properties either achieve or only marginally fail the requirements for 25% Average Probable Sunlight Hours ("APSH"). In relation to winter targets the majority of surrounding properties either receive or only marginally fail the requirements of 5% APSH, with the exception of St Augustine (a church) which achieves a level of 0-3%.
- 2.19 In relation to the outline elements of the application (the remaining part of Plot 10, 11 and 12), the assessment concluded that the vast majority of windows serving surrounding properties retain very good daylight levels despite the increase in density. It is also noted that in the case of some of the instances of the lower ratings, these are secondary windows and therefore there should not be a significant impact on daylight levels to these rooms.
- 2.20 The planning committee report (**CDB.2.1**) and members deliberations, concluded that the site's location within the wider Colindale regeneration area and the adopted SPD guidelines, along with the regeneration benefits of the scheme; the placemaking improvements, the provision of new and improved community facilities and the delivery of a significant amount of affordable housing, that on balance the daylight and sunlight impacts to these adjoining properties is acceptable.
- 2.21 The first Reserved Matters application pursuant to the outline approval (Ref 22/2599/RMA) (**CDB.7**) was submitted in May 2022, in respect of the detailed design of Plots H and K of Stage B (Plan 8 of the Book of Plans) This application is for the construction 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 (Plan 12 of the Book of Plans).
- 2.22 Accompanying the application, was a daylight and sunlight report (**CDB.7.01**). The report identified a number of properties containing residential accommodation that due to their proximity to the new development, an assessment of the potential impact on their daylight and sunlight amenity was undertaken. The report concludes that retained VSC values where noticeable alterations may occur, are considered to be adequate to good for the locality, and notwithstanding there may be some noticeable reductions in daylight to some of the properties surrounding the site, the vast majority of windows retain very good daylight levels despite the increase in density of the development. Ninety-six percent of the total number of windows retain above the suggested 15% VSC target with less than 4% of windows achieving below this level. Some of these are secondary windows that supplement a room which has a main window retaining daylight above this level and therefore it is considered there is a minimal impact and that overall, the proposed development relates well with the existing residential in terms of daylight.

- 2.23 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. Where rooms fall below this level, they do so marginally, and the report concludes that the retained APSH values where below are consistent with urban developments. This is also similar for winter APSH where, in urban areas, it is considered receiving any winter APSH is often impossible.
- 2.24 Barnet's Strategic Planning Committee resolved to grant planning permission for this Reserved Matters application on 15th December 2022 **(CDB.7)**. The formal planning decision has not been issued at the time of writing this statement although there is no planning or legal impediment to it being issued.

3. Conditions and Section 106 Controls

Conditions

3.1 The 2020 Permission (**CDB.1**) incorporates a number of conditions of approval to ensure delivery of a high-quality scheme in keeping with the design ethos established within the Design and Access Statement and approved Parameter Drawings. Conditions encompass the following areas:

- Control over timing and delivery of phases - to minimise the impact on the surrounding neighbourhood and to ensure where possible, that secure tenants and resident leaseholders wishing to say on the estate, only have one move.
- development quantum in accordance with the Development Specification and conformity with mitigation measures established through the Environment Statement (ES) accompanying the 2020 Permission ;
- Control over construction processes, methodologies and systems in accordance with the Construction Method Statement and Site-wide Construction and Environmental Management Plan;
- Sustainable Design and Construction e.g., residential space standards, internal layout and design, amenity space, daylight, privacy, outlook and light pollution, accessible and adaptable dwellings, wheelchair user dwellings, energy and water efficiency, waste minimisation and air and noise quality etc. in accordance with the Design and Access Statement and Planning Statement;
- Design controls to maintain a high quality and appearance of the Scheme as its implementation progresses through respective phases enforced through adherence to Design Guidelines
- Management of the Estate (Management Strategy)
- Biodiversity and Environmental Controls e.g. the Ecological Management Plan (EMP), contaminated land, flood risk and drainage management, trees and landscaping etc.
- Highways e.g. road layout, parking, access and junction visibility, Travel Plans, Car Clubs, cycle parking provision and street lighting etc.

The Section 106 Agreement

3.2 The Section 106 Agreement (**CDB.6**) includes requirements concerning financial contribution payments and mitigation measures. To date all payments have been made on the appropriate trigger points specified in the legal agreement. A summary of remaining obligations relevant to the Order Land is provided below. The summary table showing the obligations pursuant to this development, including details of the obligations which have been met in full or part is included as Appendix 1.

- 3.3 The Affordable Housing obligation requires the provision of no less than 50 per cent of the total number of Residential Units (by both habitable room and floorspace) in the form of 346 social rent/affordable rent and 699 shared ownership homes.
- 3.4 The Affordable Housing Review obligation requires the Developer, to provide an Early (if implementation is delayed), Mid and Late Stage Viability review. The development was implemented prior to the triggering of an early stage review and the mid and late stage viability reviews have not been triggered yet

Transportation and Highway Works

- 3.5 The provisions within the Section 106 Agreement (**CDB.6**) in relation to Public Transport require the Developer to pay £450,000 which is Index-Linked to the Council as agent for Transport for London to be used towards improvements to the existing Colindale underground railway station (up to a maximum of £160,000)
- 3.6 The clauses relating to the CPZ Contributions require the Developer to pay the Council a sum of £ 105,000 Index-Linked being a contribution towards:
- a. a study and the implementation of a bespoke Grahame Park controlled parking zone on adopted roads within the Development; and
 - b. Traffic Regulation Order amendments to exclude (new) residents from CPZ permits (outside of the redline boundary); and
 - c. costs of monitoring the implementation and progress of travel plans
- 3.7 The Section 106 Agreement (**CDB.6**) also includes a provision towards improving cycling and walking in the area involving the payment of the sum of £150,000.00 Index-Linked to be paid by the Developer and applied towards improvements to the local cycle and pedestrian route network as follows:
- I. Northern pedestrian route to Mill Hill Broadway Railway Station and the district town centre; and
 - II. Martlesham Walk pedestrian and cycling route improvement works (525 metre route).

Recruitment, Employment and Training

- 3.8 The S106 (**CDB.6**) includes a requirement that the applicant employs appropriate measures to achieve appropriate level of apprentices and other employment requirements. Financial contributions are payable in the event of failure to achieve these targets.

Community Centre, Nursery, Health Centre,

- 3.9 The S106 (**CDB.6**) requires the development to either provide the above facilities before the demolition of existing facilities within the Grahame Park Estate or depending on Council preferences to make a financial contribution towards the

Heybourne Park Contribution

- 3.10 The Heybourne Park Contribution obligation requires the Developer to pay to the Council a total Contribution of £2,000,000 prior to occupation of 1200 Residential Units. This is the main area of greenspace adjoining the Order Land and will provide for an enhanced open space resource for future residents of the estate as well as the wider surrounding area. The Park will also contain the majority of play space for the development. An indicative plan was submitted with the outline planning application showing the range of activities and improvements which could be accommodated in this space, however the final specification will be at the discretion of the Council's Green Spaces Team.

Carbon Offset and Connection to District Heating

- 3.11 The S106 (**CDB.6**) requires the developer to make carbon off set payments in order to achieve zero carbon targets. An appropriate formula is included in the S106 in accordance with GLA guidelines. The S106 also requires that provision is made for future connection to a wider District Heating Network in the future.

4. Compliance with the Adopted Planning Policy Framework and Benefits of The Development Proposed For The CPO Land

4.1 There is a clear planning framework for the Scheme (Stage A and B) and the Next Phase (Plots 10,11 and 12) (both that in place at the time the 2020 permission (**CDB.1**) was granted and the earlier planning permissions, which has been founded on an appropriate evidence base and has been subjected to consultation. The key components of the planning framework are:

- The NPPF (2021);
- National Planning Practice Guidance;

4.2 The Development Plan which comprises:

- The London Plan (2021);
- London Borough of Barnet Local Plan – Core Strategy 2012;
- London Borough of Barnet Development Management Strategies (2012);
- Colindale Area Action Plan (March 2010);

4.3 Supplementary Planning Guidance / Documents:

- Mayor of London Energy Assessment Guidance (June 2022)
- Mayor of London Circular Economy Statements LPG (March 2022);
- Mayor of London Whole Life Carbon Assessments LPG (March 2022);
- Mayor of London 'Be Seen' energy monitoring guidance (September 2021);
- Better Homes for local people: The Mayor's Good Practice Guidance to Estate Regeneration (February 2018);
- Mayor of London Affordable Housing and Viability SPG (2017);
- Mayor of London Housing SPG (2016);
- Mayor of London Shaping Neighbourhoods Accessible London: Achieving an Inclusive Environment SPG (2014)

- Mayor of London Shaping Neighbourhoods: Play and Informal Recreation SPG (2012);
- Grahame Park SPD (2016);
- London Borough of Barnet Residential Design Guidance SPD (2016); and
- London Borough of Barnet Sustainable Design and Construction SPD (2016).

4.4 In addition, the Council is in the process of preparing a new Local Plan 2037. The Council consulted on the Regulation 19 draft Local Plan between 28 June to 9 August 2021. The draft Local Plan was approved by the Council on 19th October 2021 for submission to the Secretary of State. An Examination in Public (EiP) commenced on 20 September 2022 and the hearing sessions are due to close in mid-November 2022.

4.5 The Mayor of London is currently preparing a number of new and updated SPGs and LPGs (London Planning Guidance) including:

- Fire Safety LPA (consultation draft) (February 2022);
- Characterisation and Growth LPG (consultation draft) (February 2022);
- Housing Design Standards (consultation draft) (February 2022);
- Optimising Site Capacity: A Design-led Approach LPG (consultation draft) (February 2022);
- Sustainable Transport, Walking and Cycling LPG, (consultation draft) (September 2021);
- Urban Greening Factor LPG (consultation draft) (September 2021); and
- mm
- Air quality positive LPG, consultation draft) (November 2021).

4.6 As Reserved Matters Applications are brought forward, they will take account of these new SPGs as appropriate.

4.7 The following paragraphs summarise how the Next Phase delivers the key planning policy objectives for the area and is set within a clear strategic framework in accordance with the DLUHC Guidance. It summarises how the Next Phase fits in with the adopted Development Plan as well as the draft Local Plan and the benefits the Next Phase will deliver.

Principle of the development: The redevelopment and regeneration of Plots 10, 11 and 12

4.8 The principle of the residential-led mixed use redevelopment and regeneration of Plots 10, 11 and 12 (“the Next Phase”) of the Grahame Park Estate on previously developed land is strongly supported by the planning framework at national, regional and local level. National guidance through the NPPF seeks to ensure sustainable development within three key dimensions: economic, social and environmental. It seeks to achieve positive improvements to

the quality of the built environment, as well as people's quality of life and create mixed and balanced communities. The NPPF places a strong emphasis on the creation of mixed-use development and the development of previously developed land or "brownfield" land to promote the principles of sustainable development and the effective use of land.

- 4.9 Likewise, the London Plan 2021(**CDF.8**) encourages the reuse of previously developed land and seeks to optimise sustainable development within London's Opportunity Areas. London Plan Policy SD1 (Opportunity Areas) advises that the Mayor will support regeneration in Opportunity Areas including the Colindale Opportunity Area which has been identified as having capacity for a significant number of homes (indicative capacity of 7,000 additional new homes) and jobs (indicative capacity of 2,000 jobs).
- 4.10 London Plan Policy GG2 (Making the best use of land) promotes sustainable mixed-use places that make best use of the land. It encourages development of brownfield land, particularly in Opportunity Areas and sites which are well connected by existing or planned public transport as well as identifying the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.
- 4.11 London Plan Policy H8 (Loss of existing house and estate redevelopment) requires the loss of existing affordable housing to be replaced by new affordable housing at existing or higher densities with at least the equivalent level of overall floorspace. Part C of the policy requires boroughs, housing associations and their partners to always consider alternative options before considering the demolition and replacement of affordable homes. The potential benefits of demolition and rebuilding of homes has to be considered against the wider social and environmental impacts and the availability of Mayoral funding and any conditions attached to that funding. Supporting text to the policy advises that only once the objectives of an estate regeneration scheme have been formulated in consultation with residents, should physical interventions required to achieve them be considered. All schemes need to take account of the requirement for a ballot of residents when accessing Mayoral funding for schemes that involve demolition.
- 4.12 The Council's local planning policies further promote the redevelopment and regeneration of Grahame Park. Barnet's Core Strategy includes a core objective to regenerate the priority housing estates including Grahame Park replacing existing homes with a greater range of accommodation that provides access to affordable and decent new homes. The Estate is within the Colindale Regeneration Area with Grahame Park Way identified as a Corridor of Change where the redevelopment of the Grahame Park Estate and the Barnet College site will provide for the replacement of the neighbourhood centre at Grahame Park and create a vibrant mixed-use centre, as well as providing 3,440 homes. Policy CS3 (Distribution of growth in meeting housing aspirations) confirms the major priority of the Council to regenerate failed housing estates including Grahame Park which will be subject to long term programmes of regeneration to tackle poor quality housing, social isolation, and transformation into successful mixed tenure places.

- 4.13 The principle of the redevelopment of the Grahame Park Estate is also well established in the Colindale Area Action Plan (**CDF.10**) which expects the development of other sites to support the ongoing regeneration of the Estate and integrate with new development and the existing area of the Estate. The Grahame Park SPD also re-confirms the principle of the redevelopment of the Estate.
- 4.14 Within the Council's draft Local Plan, Policy GSS01 (Delivering Sustainable Growth) continues to direct new housing to Growth Areas that includes the Colindale Opportunity Area and Estate renewal and infill (including Grahame Park) with a large-scale regeneration of the Estate. Policy GSS06 (Colindale Growth Area) focuses development up to 2036 in a number of locations including the Grahame Park Estate, which will deliver 2,760 new homes, with the Next Phase delivering a net increase of 1,458 new homes that will be much better integrated with surrounding areas and provide a wider choice of housing type and tenure.
- 4.15 Policy GSS10 (Estate Renewal and Infill) confirms that the Council working with Barnet Homes, Registered Social Landlords and the Mayor of London will continue its programme of estate renewal and infill to inform the urban form of housing estates in the Borough, making better use of underutilised land to provide better quality amenity space and 4,400 new homes. This includes the renewal of Grahame Park. The policy requires redevelopment proposals to ensure that the following requirements are met:
- Demonstrate improvement in the quality of the housing stock and the surrounding environment;
 - Achieve a net increase of housing units;
 - Consider the needs of existing households on the estate;
 - Provision of housing tenure and mix according to the specific site needs, taking into account local housing need, local infrastructure need, the nature of the surrounding area, and viability;
 - Ensure access to sufficient amenity space including open spaces and children's playgrounds;
 - Ensure access to sufficient supporting infrastructure where the impacts of development require mitigation. This may include but is not limited to child nurseries, schools, community centres, sport and leisure facilities, and healthcare;
 - Design in active travel to promote walking and cycling and demonstrate sufficient access to public transport; and
- 4.16 The redevelopment of the Estate will deliver all of the above objectives of Policy GSS10.
- 4.17 Alternative options that relied upon retention and refurbishment of all existing buildings were not considered by the Council to overcome the significant issues concerning the Estate. It was determined that these issues could only be overcome with a significant part of the Estate being redeveloped, and only parts of the Estate being retained and refurbished. The existing buildings in the Next Phase will be replaced with high-quality new homes.

- 4.18 The Scheme, which has been progressed as part of a plan-led process to redevelop and regenerate the Estate, will deliver a total of 2,088 homes in the Next Phase, with a mix of tenures in a high-quality sustainable development. The Next Phase will provide new community facilities such as a community centre and children's nursery and commercial uses making best use of this previously developed land. There will be significant improvements to the physical environment, circulation around the Estate and public realm creating a safe and attractive place for the local community to live and work. The above are in accordance with the aspirations in the planning framework for the regeneration of the site.
- 4.19 The Scheme and the Next Phase accords with the Council's aspirations and corporate, objectives for Grahame Park. It will deliver substantial benefits in terms of new housing, social, community, sustainability and physical improvements.

Residential Use

- 4.20 All levels of the planning framework support and promote the delivery of new homes. The NPPF seeks to significantly boost the supply of housing and seeks to deliver a wider range of high-quality homes to create sustainable, inclusive and mixed communities. Paragraph 75 of the NPPF requires that, in order to maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Under National Government's Housing Delivery Test: 2021 measurement, the Council has delivered 108 per cent of its housing target. The Scheme will significantly contribute to the delivery of new homes to assist the Council in continuing to deliver and meet its housing target.
- 4.21 The London Plan **CDF.9)** places significant emphasis on increasing housing supply. The Mayor's London Housing Strategy (2018) states that he will directly assemble land for development and support boroughs, housing associations, and other homebuilders to ensure the potential of London's Opportunity Areas is maximised. This may be through direct investment or through supporting compulsory purchase of appropriate land. There are a number of London Plan policies encouraging the optimisation of residential development on accessible brownfield sites. In particular London Plan Policy H1 (Increasing housing supply) sets the Council a minimum housing target to deliver 23,640 new homes between 2019/20 and 2028. Of this, 7,000 new homes are required in the Colindale Opportunity Area.
- 4.22 Core Strategy Policy CS3 (Distribution of growth in meeting housing aspirations) identifies Colindale as one of the three main areas to provide the majority of housing for the Borough. The Core Strategy (**CDF.2)** acknowledges the proposals for the regeneration of the Grahame Park Estate. The Housing target in the Core Strategy has now been superseded by the target in the London Plan.
- 4.23 The Council's draft Local Plan sets a more ambitious housing target, accepting the draft London Plan target of 35,460 new homes over the plan period up to 2036. Draft Policy GSS01 (Delivering sustainable growth) directs new homes to the Colindale Growth Area including Grahame Park with a target of 4,100 new homes. Draft Policy GSS06 (Colindale Growth Area) advises that "The Grahame Park Estate will be renewed and much better integrated with surrounding areas, delivering 2,760 new homes providing wider housing type and tenure". Draft Policy GSS10

(Estate Renewal and Infill) confirms that Grahame Park is a housing estate identified for renewal with the delivery of 4,400 homes across the estate renewal programme.

4.24 The proposed number of new homes across the Scheme (2,088 homes) responds to the policy requirement of the GLA to re-provide social rented affordable housing on the Estate (Policy H8) and to ensure that a viable and high-quality scheme can be delivered and is in line with the London Plan and the Council's emerging policy.

4.25 The Scheme's provision of a significant quantum of high-quality housing is consistent with the objectives of the planning framework and will make an important contribution towards achieving the Mayor of London and the Council's objectives to deliver more homes in Grahame Park and the wider Colindale area to meet the ambitious housing target for the Borough in the London Plan. The Scheme will provide a mixed housing tenure and provide high quality housing stock for residents.

Non-residential uses: Community, retail and employment

4.26 The Next Phase will deliver a variety of non-residential uses including community, retail and flexible workspaces in place of the existing facilities within the neighbourhood centre on the Concourse. These non-residential uses will be a significant improvement on what is currently on the Estate, by replacing the lower quality facilities with new community facilities, such as the community centre and children's nursery (Class D2 under the previous Use Classes Order) to be delivered on site and a range of retail/commercial unit sizes and types in flexible uses (Class A1 – A3 and B1 under the previous Use Class Order).

Community Uses

4.27 All levels of the planning framework seek to protect, improve and enhance social infrastructure. London Plan Policy S1 (Developing London's social infrastructure) advises that in areas of major new development and regeneration, social infrastructure needs should be addressed via area-based planning. Development proposals that provide high quality, inclusive social infrastructure that addresses a need should be supported. Development proposals that result in a loss of social infrastructure should only be permitted where there are realistic proposals for reprovision or the loss is part of a wider public service transformation plan. Policy S2 (Health and social care facilities) seeks to identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses. Policy S3 (Education and childcare facilities) seeks to ensure that there is a sufficient supply of good quality education and childcare facilities and ensure that there is no net loss of childcare facilities.

4.28 Core Strategy Policy CS10 and Development Management Policy DM13 seek to protect and resist the loss of community, health care and educational uses. The loss of community, health care or education uses will only be acceptable in exceptional circumstances such as where new community, health or educational uses of a least equivalent quality or quantity are provided on the site or at a suitable alternative location or that the loss is part of a wider public service transformation plan. New community, health or educational facilities should be accessible to all sections of the community and be within easy reach by walking, cycling and public transport.

- 4.29 Specifically, in relation to the Scheme the Core Strategy (**CDF.2**) stipulates a need for the replacement of Grahame Park's core neighbourhood centre which encompasses most of the community facilities.
- 4.30 Draft Local Plan Policy CHW01 (Community Infrastructure) only permits the loss or replacement of existing community facilities if the replacement facility is equivalent to or better quality than the existing facility. The Council will support proposals for new community infrastructure where it forms part of a mixed-use development and is within a Growth Area. GSS10 (Estate Renewal and Infill) requires redevelopment proposals to ensure access to sufficient supporting infrastructure where the impacts of development require mitigation. This may include but is not limited to children's nurseries, schools, community centres, sport and leisure facilities, and healthcare.
- 4.31 The Next Phase includes the demolition of the existing/former community uses including: the community centre; the old library, the health centre and the nursery and the replacement of this provision in line with the objectives of the planning framework.
- 4.32 A new library has already been constructed and is operational as part of Stage A.
- 4.33 The Next Phase includes the re-provision of the community centre (c. 800sqm) and nursery (c. 400sqm). As well as providing larger facilities (the existing community centre is 309 sqm and the closed existing nursery, is 380sqm), the new facilities will also provide much higher quality accommodation than the facilities they replace. The facilities will be located along the proposed north-south central spine road and will be easily accessible to the existing and future Grahame Park community by walking, cycling and public transport. The replacement community centre is to be delivered in Plot 12 of the Next Phase and prior to the demolition of the existing community centre. Consultation has already taken place with local community groups and operators to ensure the centre is multi-purpose and meets the requirements of the different user groups. The children's nursery will also be delivered as part of Plot 12. The developer will select a 3rd party (nominee) to take on the community centre lease or enter into a management agreement for the management of the community centre at a peppercorn rent.
- 4.34 With regard to the requirement for a replacement health centre, proposals exist for a purpose-built health facility on the former Peel Centre site (Colindale Gardens), to the south of Grahame Park, which would serve residents of Grahame Park. This new facility is currently being constructed and is due to complete ahead of when vacant possession of the existing facility is required. The health partners are finalising plans to relocate all existing services into this space currently. Should the health services not relocate as planned, then there is space within the non-residential floorspace to accommodate in Plot 12 a health care facility within the Next Phase if required.
- 4.35 The Scheme will therefore provide high quality replacement community facilities for the local community which assist in meeting the objectives for enhanced social infrastructure in the planning framework.

Retail uses

- 4.36 The planning framework at all levels seeks to protect and support local retail centres to support local needs. London Plan Policy E9 (retail, markets and hot food takeaways) advises that development proposals should support

convenience retail in local and neighbourhood centres, to secure inclusive neighbourhoods and a sustainable pattern of provision thereby reducing the need to travel.

- 4.37 Core Strategy Policy CS6 and Development Management Policy DM12 seek to enhance and protect local neighbourhood shopping facilities, preventing the loss of retail uses unless there are accessible alternative shopping facilities and there is no demand for the continued A1 use. The Council's Policy DM12 identifies Grahame Park as a local centre, with numbers 1-21 The Concourse designated a local shopping frontage.
- 4.38 The Grahame Park SPD (**CDF.4.01**) states that there are currently 9 Use Class A1 (under the previous Use Classes Order) retail units, totalling 1,430sqm of floorspace, including the recently re-opened post office. The SPD (**CDF.4.01**) states that a minimum of 1,770 sqm of retail uses are to be provided across Stages A and B of the redevelopment of Grahame Park. Of this, 1,430sqm should be predominantly A1 uses, with other A uses also acceptable. The SPD (**CDF.4.01**) confirms that new retail floorspace has been delivered as part of Phase 1B of Stage A including a 420sqm Sainsbury's local convenience store and two further retail units of 390sqm and 196sqm, one of which is the relocated pharmacy from the Concourse, providing a total of 1,006sqm of new retail space.
- 4.39 The Draft Local Plan allocates Grahame Park as a Local / Neighbourhood Centre. Policy TOW01 (Vibrant Town Centres) promotes Local Centres to provide a local level of retail uses.
- 4.40 The Next Phase will deliver replacement retail/café uses providing a replacement to the neighbourhood centre on the Concourse, which is to be demolished, creating a higher quality of retail space and the creation of new jobs locally that will assist in delivering the aims and objectives of the planning framework to protect, enhance and support neighbourhood centres and local convenience shops. A retail unit of c. 400m² is being delivered as part of Plot A of Stage B with further retail space being delivered within the RMA currently being progressed for Plots K and H of the Next Phase.

Employment uses

- 4.41 The planning framework supports the provision of affordable and flexible employment spaces to support SME's. London Plan Policy E2 and Core Strategy Policy CS8 support affordable and flexible workspaces to meet the needs of micro, small and medium enterprises and to support firms wishing to start up or expand. Draft Local Plan Policy ECY01 (A Vibrant Local Economy) supports new office space outside Town or District Centres where the new employment use would contribute towards the Council's regeneration objectives.
- 4.42 The Scheme will deliver flexible employment space which will assist in delivering the strategic planning framework by providing a range of workspaces for local businesses and creating local employment.

Housing Provision: Tenure, Unit Mix

Affordable housing provision

- 4.43 A key objective of the planning framework is to deliver affordable housing to allow Londoners of all means and backgrounds to play their part in community life and is important to delivering good growth, ensuring that London remains a mixed and inclusive place in which people have a choice about where to live.
- 4.44 London Plan Policy H4 (Delivering affordable housing) sets a strategic target of 50% of all new homes delivered across London to be genuinely affordable. London Plan supporting text in paragraph 4.5.14 confirms that planning applications for schemes that involve the demolition of existing affordable dwellings, which are required to follow the approach in London Plan Policy H8 (Loss of existing housing and estate redevelopment), must follow the Viability Tested Route, and in accordance with London Plan Policy H5 (Threshold approach) submit supporting viability evidence with the planning application to demonstrate that the level of affordable housing proposed is the maximum that can be provided. Supporting text to policy H5 in paragraph 4.5.3 advises that the percentage of affordable housing on a scheme should be measured in habitable rooms to ensure that a range of sizes of affordable homes can be delivered.
- 4.45 Core Strategy policies CS4 and DM10 set a target of 40% affordable homes boroughwide on sites capable of accommodating ten or more dwellings with the maximum reasonable amount of affordable housing required on site, subject to viability.
- 4.46 Draft Barnet Local Plan Policy HOU01 (Affordable housing) advises that within the context of a strategic London Plan target of 50% of all new homes to be affordable, the Council will seek a minimum of 35% affordable housing from all developments of 10 or more dwellings. On Housing Estates (Policy GSS10) the Council will seek to replace existing affordable housing whilst considering the specific circumstances of each site.
- 4.47 The Next Phase will deliver 50% of units as affordable housing as required by the S.106 Agreement for the 2020 Permission both in terms of habitable rooms and floorspace. A Viability Assessment has been undertaken in accordance with London Plan Policies H5 and H8 which concludes that the proposed 50% provision of affordable housing is the maximum amount of affordable housing that can viably be provided in the redevelopment of Plots 10, 11 and 12. Plot A, currently on site, will deliver a 100% affordable scheme and include 60 social rent/London Affordable Rent ("LAR") homes to accommodate the remaining secure tenants within the Next Phase and 149 shared ownership homes. The amount of affordable housing proposed therefore meets the objective of the planning framework to deliver affordable housing and create a mixed and inclusive community.

Reprovision of social rented housing

- 4.48 An objective of the planning framework is to re-provide social rented housing in estate regeneration schemes. London Plan Policy H8 (Loss of existing housing and estate redevelopment) Part A states that the loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace. Part D only permits the demolition of affordable housing, including where it is part of an estate

redevelopment programme if it is replaced by an equivalent amount of affordable housing floorspace. Part D continues:

- 4.49 “Affordable housing that is replacing social rent housing must be provided as social rent housing where it is facilitating a right of return for existing tenants. Where affordable housing that is replacing social rent housing is not facilitating a right of return, it may be provided as either social rent or London Affordable Rent housing. Replacement affordable housing should be integrated into the development to ensure mixed and inclusive communities.”
- 4.50 Part E of the policy requires all development proposals that include the demolition and replacement of affordable housing to follow the Viability Tested Route and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace.
- 4.51 When the redevelopment of Plots 10, 11 and 12 (“the Next Phase”) is completed the provision of social rented/London Affordable Rent (“LAR”) will exceed the original number of habitable rooms/quantum of floorspace across Stages A and B of the Estate redevelopment. The submitted Viability Assessment demonstrated that this is the maximum amount of social rent/LAR that can be provided within the Next Phase. The Next Phase therefore meets the objective of the planning framework in that it re-provides social rented housing as well as providing an overall uplift in affordable housing.

Phasing of affordable housing

- 4.52 It is proposed that the redevelopment of the Next Phase will take place over several sub phases. The first phase which comprises the redevelopment of Plot A will deliver 209 units which will be 100% affordable housing. The remainder of the affordable units will be delivered in subsequent phases. The first phase providing 100% affordable housing meets the objectives of the planning framework to deliver affordable housing and ensure that existing residents on the estate are rehomed at the first opportunity.

Affordable housing tenure split

- 4.53 The planning framework requires a mix of tenures of affordable housing to be delivered to provide a range of choice and to deliver mixed and inclusive communities. London Plan Policy H6 (Affordable housing tenure) requires the following tenure split: a minimum of 30% low cost rented housing as either London Affordable Rent or Social Rent; a minimum of 30% of intermediate products which meet the definition of genuinely affordable housing including Shared Ownership and London Living Rent; and the remaining 40% to be determined as low cost rented homes or intermediate products by the borough.
- 4.54 The Barnet Core Strategy policy CS4 and the Draft Barnet Local Plan Policy HOU01, both expect Barnet’s affordable housing tenure to be as follows: 60% Low-Cost Rent products including Affordable Rent and 40% intermediate homes including London Living Rent and London Shared Ownership.
- 4.55 The Next Phase will deliver over 30% low cost rented accommodation (by units, habitable rooms and floorspace) and over 30% will be delivered as shared ownership (by units, habitable rooms and floorspace).

- 4.56 The affordable housing tenure mix does not completely accord with the adopted and draft Barnet policies. However, the quantum of proposed social rent/LAR is the maximum amount in terms of units/habitable rooms/floorspace that can be viably provided within the redevelopment as has been evidenced through viability assessment.
- 4.57 The Scheme will contribute to an increased provision of social rented housing across the regeneration of the Estate as a whole (Stage A (which has been completed) and Plots 10-12). Overall, more social floorspace is proposed than is being lost through demolition.
- 4.58 The proposed affordable housing tenure split is considered to be acceptable and meets the objectives of the planning framework which is to deliver a mix of high-quality affordable housing that will provide choice and result in inclusive and mixed communities.

Unit Mix

- 4.59 The planning framework requires schemes to include a range of unit sizes to provide choice and deliver mixed and inclusive communities. London Plan Policy H10 (Housing size mix) requires schemes to consist of a range of unit sizes, having regard to a number of factors that include local housing need and demand; the requirement to deliver mixed and inclusive neighbourhoods; and the aim to optimise housing potential.
- 4.60 The Council's Local Plan documents (Core Strategy **(CDF.2)** and Development Management Policies **(CDF.3)** (DPD) identify 3- and 4-bedroom units as the highest priority types of market housing for the Borough. Supporting text to Policy DM8 acknowledges that the policy can be applied flexibly. The Draft Barnet Local Plan Policy HOU02 (Housing Mix) requires development to provide a mix of dwelling types and sizes. For market homes, 3-bedroom properties are the highest priority with 2- and 4-bedroom properties a medium priority. For low-cost rent, 2- and 3-bedroom properties are the highest priority; with 3-bedroom properties the highest priority for London Living Rent and 2-bedroom properties as the highest priority for homes for Affordable Rent / Low Cost Home ownership.
- 4.61 The existing accommodation within the Next Phase comprises 95% 1 and 2 bed units (229 x 1 bed, 368 x 2 bed and 33 x 3 bed units). The proposed housing mix for the Next Phase (shown in the table below) provides a broader mix of units across the site, and while the largest proportion of units comprise 1- and 2-bedroom units, 76 family sized units are provided as social rented accommodation (3, 4 and 5 bed units) and 123 units are provided as family sized market accommodation.

Size	Social Rent/ Affordable Rent	Shared Ownership	Private	Total
	Units	Units	Units	Units
Studio	0	0	75	75
1-Bed	123	417	430	970
2-Bed	147	282	415	844
3-Bed	53	0	123	176
4 Bed	22	0	0	22
5 Bed	1	0	0	1
Total	346	699	1043	2088

4.62 The Next Phase will provide a range of unit sizes from studio flats to four- and five-bedroom units. The mix of unit sizes proposed is based on a number of factors including; optimising the housing potential of the site; ensuring the delivery of a high quality viable scheme that provides 50% affordable housing; and the re-provision of social rented housing.

4.63 A full mix of units is proposed for the social rent/London Affordable Rent ("LAR") units. More than half of the low-cost rent units will have two or more bedrooms.

4.64 The Next Phase provides an appropriate mix of different unit sizes in accordance with the planning framework that will address the need for a range of different unit sizes and create a mixed neighbourhood.

Residential Standards

4.65 The planning framework requires developments to meet a number of residential standards with the objective of ensuring that homes are of an adequate size, comfortable, accessible and fit for purpose.

4.66 A sufficient level of design work on the potential design of the outline element of the proposed scheme has been undertaken to ensure the proposed quantum of residential units can be delivered in future phases and will meet the necessary residential standards.

Internal space standards

4.67 London Plan Policy D6 (Housing quality and standards) 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 (Promoting High Quality Design) also requires development to be in accordance with the standards in the London Plan.

- 4.68 All homes 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 for bedroom sizes, bathrooms/WC's and storage and utility.

Internal Living Standards

- 4.69 The London Plan Policy D5 (C), The Mayor's Housing SPG Standard 29, Draft Local Plan Policy CDH01, Grahame Park SPD (**CDF.4.01**) and LBB's Sustainable Design and Construction SPD seek to maximise the provision of dual aspect dwellings 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 Policy D3 Part B (Optimising site capacity through a design led approach) than a dual aspect dwelling and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.
- 4.70 There will be no single aspect north facing dwellings in the buildings proposed to be constructed on Plot A and 99% of family sized units (2 - 5 bed) are dual aspect. The same principles will apply to the all the properties within the Next Phase.
- 4.71 Shared circulation in terms of accessibility to the core, internal corridors and lift access are compliant with the current Housing SPG standards.

Accessible Homes

- 4.72 London Plan Policy D7 (Accessible housing), Core Strategy Policy DM03 (Sustainable and Inclusive Design) and Draft Local Plan Policy CDH02 (Sustainable and Inclusive Design) require at least 10% of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) to meet Building Regulation requirements M4 (3) 'wheelchair users dwellings'. All other dwellings to which Part M volume 1 of the Building Regulations applies are required to meet Building Regulation Requirement M4 (2) 'accessible and adaptable' dwellings.
- 4.73 The detailed element of the Next Phase in Plot A includes 21 M4 (3) compliant units (10% of the total number of units. All other units in the Next Phase will be constructed in accordance with Building Regulations Requirement M4 (2).
- 4.74 The reserved matters applications for the Next Phase will also be designed to be in compliance with M4 (2) and M4 (3) details of which will be provided at the relevant reserved matters stage.

Private outside space

- 4.75 The Mayor's Housing Guide SPD and Policy D6 of the London Plan require a minimum of 5sqm of private outdoor space for all 1-2 person dwellings and an extra 1sqm for each additional occupant. The minimum width and depth for all balconies and other private external spaces is 1500mm, and private outdoor spaces should have level access from the home to meet Lifetime Homes standards. The LBB Sustainable Design and Construction SPD sets out the following standards for private amenity space:

- 5sqm/ habitable room for flats;
- 40sqm for up to four habitable room houses;
- 55sqm for up to five habitable room houses;
- 70sqm for up to six habitable room houses; and
- 85sqm for up to seven habitable room houses.

4.76 Draft Barnet Local Plan Policy CDH07 (Amenity Space and Landscaping) for flats repeats the standards in the London Plan and for houses repeats the standards in the SPG as set out above.

4.77 All dwellings in Plot A will have access to private outside space that complies or exceeds the LBB minimum area required through the provision of balconies and terraces. All balconies and terraces will achieve a minimum depth of 1500mm and level access. The reserved matters applications for the Next Phase will meet these standards. Each home will be provided with private amenity space in the form of a balcony or terrace.

Summary

4.78 The above demonstrates that the Next Phase will meet the objectives set out in the planning framework by providing homes that meet all residential space standards, are comfortable, accessible and fit for purpose.

Design and tall buildings

4.79 The planning framework requires high quality design for new development. London Plan Policy D3 (Optimising site capacity through the design-led approach) requires development to make the best use of land by following a design-led approach that optimises the capacity of sites. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site and responds to the site's context and capacity for growth and existing and planned infrastructure capacity. Higher density developments should generally be promoted in locations well connected to jobs, services, infrastructure and by public transport, walking and cycling including Opportunity Areas. Development should be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan. Development proposals should achieve safe, secure, and inclusive environments.

4.80 Core Strategy policy CS5 (Protecting and enhancing Barnet's character to create high quality places) and policy DM01 (Protecting Barnet's character and amenity) require development to have regard to the character, form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. Development proposals should contribute to the enhanced character of an area, particularly in areas of poor or ill-defined character. Buildings, streets and open spaces are required to provide a high quality of design, having regard to the pattern, grain of the existing spaces and streets and is human in scale. Policy DM01 requires building to: be of the highest architectural quality; comprise details and materials that complement the local architectural character; and integrate well with the surrounding streets and open space.

4.81 Draft Barnet Local Plan Policy CDH01 (Promoting High Quality Design) requires residential proposals to be developed at an optimum density to make the most efficient use of land. A design-led approach to determine capacity should deliver an optimum density taking into consideration of local context, accessibility by walking and cycling, public transport and capacity of infrastructure. The policy replicates policy in the London Plan requiring developments to have a high quality of architecture and urban design, respond to local character and ensure attractive and safe streets.

4.82 The Scheme overall will deliver a larger number of residential units than the original estate, which is necessary to re-provide social rented housing, deliver an uplift in affordable housing and provide other social, physical and environmental benefits. The design-led approach to the Scheme demonstrates that the Scheme has been designed in an appropriate and sensitive way taking into consideration the character of the area and site context whilst seeking to optimise the use of land.

4.83 The Next Phase will provide a new high quality residential-led mixed use development with a significantly improved layout, public realm and architectural design compared with the poor layout, public realm and low-quality buildings that currently exists on the estate. It will deliver the aspirations of the planning framework to significantly improve:

- the layout of the estate through a defined street hierarchy creating safer and accessible pedestrian and cycle routes;
- the appearance of the estate through the creation of difference character areas with differing designs and articulation;
- the townscape through a high quality public realm;
- improved green / open and play spaces through the provision of new green and play spaces throughout the Scheme;
- facilitate improvements to Heybourne Park
- provide well designed, higher quality and larger community spaces.

4.84 It will meet the overall objective of the planning framework to provide a new high-quality estate.

Tall Buildings

4.85 The planning framework recognises the benefits of tall buildings that can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing towards new homes and helping people navigate through an area, but also recognises that tall buildings must be well designed and be in the right location to avoid any detrimental visual or environmental impacts.

- 4.86 London Plan Policy D9 (Tall buildings) advises that tall buildings (defined as not less than 6 storeys or 18 metres when measured from ground to the floor level of the uppermost storey) should form part of a plan-led approach. Boroughs should determine if there are locations where tall buildings may be an appropriate form of development. The development of tall buildings needs to have consideration to visual, functional and environmental impacts.
- 4.87 LBB's Core Strategy Paragraph 10.6.6 states that for the Grahame Park Estate, "Tall buildings ranging from 8 to 11 storeys will form an integral part of the regeneration of this priority housing estate which seeks a fundamental change in the environment and perceptions of Grahame Park". Policy CS5 advises that tall buildings (8 storeys (or 26 metres) or more) may be appropriate in a number of strategic locations which includes Grahame Park. Policy DM05 sets out a number of criteria that tall buildings must meet.
- 4.88 Draft Local Plan Policy CDH04 (Tall Buildings) advises that tall buildings (defined as 8 to 14 storeys (26 to 46 metres above ground level) may be appropriate in a number of strategic locations including Grahame Park.
- 4.89 The planning framework allows for the provision of tall buildings at Grahame Park. Careful consideration has been given to the placement of the tall buildings throughout the Next Phase having regard to local context. The tallest buildings are proposed to be located around Heybourne Park and on the park interchange with the scaling down of height at the margins of the development. The siting of the proposed tall buildings will relate well to the form, proportion, composition, scale and character of surrounding buildings and public realm and will improve the legibility of the area acting as markers emphasising the public area around Heybourne Park on the new community centre.
- 4.90 The provision of tall buildings in the Next Phase will meet key objectives of the planning framework to deliver the regeneration opportunity offered by the estate, the amount of housing required to deliver an uplift in affordable housing and improved legibility without resulting in any detrimental visual or environmental impacts.

Fire Safety

- 4.91 The planning framework requires development to achieve the highest standard of fire safety. London Plan Policy D12 (Fire safety) requires all development proposals to comply with a number of criteria set out in the policy. The Planning gateway one Regulations had not been made nor were in force when the hybrid planning permission was granted in July 2020. The Health and Safety Executive has advised that as the hybrid planning permission was granted before Planning gateway one came into effect, it is not required to be consulted on the details contained within the reserved matters applications for each planning Sub-Plot. However, in accordance with the planning framework, an Outline Fire Safety Strategy has been prepared for development on Plot A setting out the key fire safety measures. During the development of each Development plot of the Next Phase, fire safety measures will be built into the design of individual buildings from the outset and a detailed Fire Strategy in accordance with the requirements of Planning gateway one and London Plan Policy D12, will be prepared for each Development plot. The Next Phase will deliver the objectives of the planning framework to achieve the highest standard of fire safety.

Open space, children's play space, green infrastructure and biodiversity

4.92 The planning framework seeks to deliver green infrastructure, open spaces and play spaces to promote mental and physical health, adapt to the impacts of climate change, encourage walking and cycling, learning about the environment, supporting food growing and enhancing biodiversity and ecological resilience.

Open space

4.93 London Plan Policy D3 (8) requires development to provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity. London Plan Policy G4 (Open space) requires that development proposals should not result in the loss of open space and where possible should create areas of publicly accessible open space.

4.94 Core Strategy policy CS7 (Enhancing and protecting Barnet's open spaces) and DMP Policy DM15 (Green belt and open spaces) seek to protect and enhance Barnet's open space through securing additional on-site open space or other open space improvements, improving access to open spaces and securing improvement to open spaces including provision for children's play and sports facilities. In exceptional circumstances the loss of open space will be permitted if equivalent or better-quality open space provision can be made. Draft Barnet Local Plan Policy ECC04 (Barnet's Parks and Open Spaces) advises that the Council will secure improvements to open spaces, where opportunities arise, from all developments that create an additional demand for open space. Where this is not viable, a cash in lieu payment will be required for off-site provision or enhancement to open spaces that are nearby. Any proposal that involves the loss of low quality and low value open space must robustly demonstrate that a number of criteria can be satisfied including that the development is a small-scale ancillary use that supports the open space and opportunities to improve the existing space have been explored and cannot be delivered or equivalent or better open space provision will be delivered.

4.95 Heybourne Park is an area of open space and is identified on Map 10 in the Core Strategy as a Local Park. The map also identifies that all of the estate is within 400m of a Local Park and therefore is not an area with a deficiency in public open space.

4.96 The Next Phase impacts on the current boundary of the Park and overall, there will be a loss of 0.07ha. However, the proposals (supported by contributions set out in the S106) will facilitate a significantly improved park which will include landscaping, play areas, sports facilities and seating areas where currently little exists, the plans for which are being progressed by the Council. In addition, the overall Scheme will deliver a significant increase in public and private open space of 980sqm. Improvements to the overall quality of the park will be made by the Council and high quality new and accessible public spaces will be introduced. Residents were consulted on indicative changes to the park during public consultation events and no objections were raised. Further consultation will be undertaken as the proposals are further developed.

4.97 The proposals for open space will meet the objectives of the planning framework to deliver new and improved open spaces that will provide benefits to mental and physical health, encourage walking and cycling, support food growing and enhance biodiversity.

Children's play space / sport and recreation facilities

4.98 London Plan Policy S4 (Play and informal recreation) and LBB Policy DM2 (Development standards) provide that development proposals for schemes that are likely to be used by children and young people should not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand.

4.99 Core Strategy policy CS7 (Enhancing and protecting Barnet's open space) and Draft Barnet Local Plan Policy ECC04 (Barnet's Parks and Open Spaces) seeks to secure improvements to provision for children's play and sports facilities where opportunities arise, from all developments that create an additional demand.

4.100 The Next Phase proposes that child play space will be distributed across the Phase, with a focus on doorstep play to complement the larger offerings in Heybourne Park with space for all ages. Local areas for play will be provided very near to homes in semi-private courtyards or publicly accessible gardens. Local equipped areas for play will be targeted at children aged 5-11 years. Neighbourhood equipped areas of play will be targeted at children over 11 years old

4.101 The play areas in Heybourne Park will be significantly improved with the introduction of play equipment and areas for all ages. Full details of proposals for the park is being prepared by the Council in consultation with the local community. The Next Phase will meet the objective of the planning framework in that it will promote physical and mental health of residents of the Scheme and surrounding area.

Green Infrastructure

4.102 London Plan Policy G1 (Green infrastructure) requires development proposals to incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network. London Plan Policy G5 (Urban greening) requires major development proposals to include urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

4.103 Part B of the policy requires boroughs to develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential.

4.104 An overall Landscape Strategy has been prepared for the Next Phase. The Softscape Strategy Plan proposes soft landscape on the podium courtyards, biodiverse roof planting, grass, hedges and ornamental planting around the edges of Heybourne Park and planting in front gardens. Outline details have also been developed for tree planting and urban greening, the creation of 'green streets' along the Avenue, Neighbourhood ladder (running the length of Sub-plots D, E, F, H, L and K) and the Woodland Walk, to the east of the Next Phase. It is proposed that the soft

landscape will also provide sustainable urban drainage, enhance biodiversity whilst adding to visual and amenity value.

- 4.105 In accordance with London Plan Policy G5, the UGF has been used as a tool to contribute to the provision of green infrastructure within the site. When including the park, the proposals achieve an UGF score of 0.52. Excluding the Park from the calculation, the remainder of the Next Phase achieves an UGF score of 0.40. This confirms that even without the inclusion of the park the Next Phase provides an abundance of green space to maximise tree retention and provision of suitable enhanced ecology and green amenity space meeting the objectives of the planning framework.

Trees

- 4.106 London Plan Policy G7 (Trees and woodlands) and Draft Local Plan Policy ECC04 (Barnet's Parks and Open Spaces) requires 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, determined by, for example, 'i-tree' or CAVAT or other appropriate valuation system. The planting of additional trees should be included in new developments – particularly large-canopied species which provide a wider range of benefits.
- 4.107 Arboricultural Impact Assessments (AIA) have been prepared for the Next Phase. A number of trees will require removal to facilitate the regeneration of the Next Phase. Some of the proposed trees were graded category U during the survey and it is recommended that these trees are removed regardless of the proposed development due to their poor structural and/ or physiological condition.
- 4.108 The Next Phase includes a compensation strategy for the planting of trees. New planting will ensure that the correct species are chosen to provide longevity within the Borough. Further tree surveys will be undertaken to inform the detailed landscape design for each planning Sub-plot, and these will be submitted with reserved matters applications.
- 4.109 The AIA's identifies some trees that will require special protection measures in order to be successfully retained throughout the course of the development. Proposed protection measures are identified in the AIA's and further details will be provided at the reserved matters stage for each planning Sub-plot.
- 4.110 The proposals are compliant with the objectives of the planning framework to protect existing trees and provide new and replacement trees.

Biodiversity

- 4.111 London Plan Policy G6 (Biodiversity and access to nature), Core Strategy Policy CS7 (Enhancing and protecting Barnet's open spaces), Policy DM16 (Biodiversity) and Draft Local Plan Policy ECC06 (Biodiversity) requires Sites of Importance for Nature Conservation (SINCs) to be protected. Part D adds that development proposals should aim to secure net biodiversity gain. Proposals which reduce deficiencies in access to nature should be considered positively.

- 4.112 Heybourne Park is a Local Wildlife Site (Site of Importance for Nature Conservation (SINC). A number of ecological surveys (including a preliminary ecological appraisal, bats, great crested newts) have been undertaken to inform the Next Phase which determined the Estate to have low potential to support protected species.
- 4.113 The site is considered suitable for supporting common breeding birds. Features of interest in Heybourne Park include the pond, swamp and trees and species that included breeding wetland birds and the potential for frogs and newts (not great crested newts). The site holds potential for nesting birds, invertebrate species and a habitat for foraging and sheltering hedgehogs.
- 4.114 The Ecological reports conclude that due to the location of the proposed development, the features of interest associated with Heybourne Park are unlikely to be impacted by the proposed development. A number of measures such as the introduction of bird/bat boxes, proposed tree, shrub and groundcover planting and insect hotel are proposed as part of the Next Phase and will result in biodiversity net gain across the Site. The proposed development is in accordance with the objectives of the planning framework as existing ecology will be protected during and post construction and the scheme will incorporate biodiversity enhancement.

Amenity of Neighbouring and Future Residents

- 4.115 An objective of the planning framework is to ensure that the design of buildings results in comfortable environments for existing and future occupiers, provide adequate daylight, sunlight and do not compromise comfort and enjoyment of open spaces around buildings.

Overshadowing, daylight and sunlight

- 4.116 London Plan Policy D6 (Housing quality and standards), Core Strategy Policy DM01 and Draft Barnet Local Plan Policy CDH01 (Promoting High Quality Design) require development to provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space. London Plan Policy D9 (Tall buildings) requires daylight and sunlight penetration around buildings and the neighbourhood to be carefully considered and not compromise the enjoyment of open spaces around the building.
- 4.117 As set out in Paragraphs 2.16 to 2.23 Daylight/Sunlight Reports **(CDB.4.01)** and **(CDB.4.02)** have been prepared as part of the hybrid planning application for Plot A and the remaining plots in the Next Phase in accordance with BRE guidelines to assess the daylight/sunlight amenity on surrounding residential properties following the redevelopment.
- 4.118 The reports support the Next Phase in terms of daylight, sunlight and overshadowing amenity. Detailed Daylight and Sunlight assessments will be required to be undertaken for each reserved matters Development Plot application to ensure that these subsequent applications do not give rise to adverse impact and are in line with BRE guidance. These have been submitted as part of the first RMA for Plots H and K **(CDB.7.01)**.

- 4.119 An Internal Daylight Report was prepared as part of the design for the Next Phase to consider the internal daylight amenity of the proposed development of Plot A. The report concludes that the scheme has been well designed to allow good levels of daylight to penetrate the proposed units, especially in consideration of it being located in an urban area and the scheme is supported in terms of internal daylight amenity. The design of the remainder of the Next Phase will follow the same design principles.
- 4.120 The Next Phase therefore meets the objectives of the planning framework in that no adverse impacts will arise in terms of daylight, sunlight and overshadowing.

Microclimate: Wind

- 4.121 London Plan Policy D9 (Tall buildings), Core Strategy Policy DM05 (Tall buildings) and Draft Local Plan Policy CDH04 (Tall Buildings) requires the impact of wind conditions around buildings and neighbourhoods to be carefully considered and not compromise comfort and the enjoyment of open spaces around the building and in the public realm. Draft Barnet Local Plan Policy CDH02 (Sustainable and Inclusive Design Sustainable Design and Construction) requires microclimate/wind conditions to be managed in accordance with the Sustainable Design Guidance SPD.
- 4.122 A Microclimate Wind Assessment was prepared to assess the pedestrian level wind microclimate around the proposed development of the Next Phase. The report advises that the wind conditions around the proposed development in relation to existing buildings and the proposed new buildings are expected to be suitable for its intended usage. The Next Phase is therefore compliant with the planning framework and will result in no adverse impacts on microclimate and the comfort and enjoyment of open spaces around the building.

Transport, highways and parking

- 4.123 An objective of the planning framework is to encourage travel by sustainable means through the improvement of transport links, streets and the public realm to create a more attractive and legible environment, increasing cycle parking and a reduction in car parking.
- 4.124 London Plan Policy T1 (Strategic Approach to Transport) requires development proposals to support and facilitate the delivery of the Mayor's strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041. All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated. Policy T2 (Healthy Streets) requires developments to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling and deliver improvements that support the ten Healthy Street Indicators.
- 4.125 London Plan Policy T4 (Assessing and mitigating transport impacts) adds that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. Where appropriate, mitigation either through direct provision of public transport, walking and cycling facilities, highways

improvements or through financial contributions, will be required to address any adverse transport impacts that are identified.

- 4.126 Core Strategy policy CS9 (Providing safe, effective and efficient travel) confirms that the Council will promote the delivery of appropriate transport infrastructure in order to support growth and reduce the impact of travel especially in regeneration areas to support Barnet's growth. Draft Local Plan Policy TRC01 (Sustainable and Active Travel) seeks to deliver a more sustainable transport network and reduce car dependency and will require development to address the needs of cyclists and pedestrians through good connections to bus stops; stations and walking and cycling networks; a healthy, safe and attractive walking and cycling environment, seeking improvements to the wider walking and cycling environment, supporting the Healthy Streets Approach.
- 4.127 Key aspirations of the Scheme include improving legibility around the Estate; better connecting the Estate to the surrounding area and making routes safer therefore encouraging travel by more sustainable means. The Next Phase will significantly improve the local transport network through the creation of a new street network, building on the successful aspects of the layout in the Grahame Park SPD (**CDF.4.01**) to create a more legible place. The proposed network of streets will greatly improve access to and from the surrounding areas, in particular to key connections to the north including Mill Hill Broadway station and district centre. The improved north to south connection will enable existing bus routes to be re-routed creating more efficient routes through the area and increase PTAL within the estate.
- 4.128 The Scheme has been designed in line with the principles of Transport for London's ("TfL's") Healthy Streets and will significantly improve the pedestrian and cycle infrastructure across the estate and surrounding area. The new street network will create a more legible environment with a high-quality public realm and a higher degree of natural surveillance that will significantly improve safety over the existing situation and encourage walking on the estate as well as improving access to Colindale Underground station. The layout of the Next Phase incorporates a cycling network for all cyclists of differing levels of experience as well as significant cycle parking provision. All of the above measures have the potential to change the travel characteristics of the Estate to support the Mayor's strategic target of 80% of all trips in London to be made through sustainable travel.

Car Parking

- 4.129 London Plan Policy T6 (car parking) requires car parking to be restricted in line with levels of existing and future public transport accessibility and connectivity. London Plan Policy T6.1 (Residential parking) and Table 10.3. advise that the maximum car parking provision for residential development in Outer London Opportunity Areas is 0.5 spaces per dwelling. The maximum parking standards for non-residential uses are 1 space per 75sqm GIA for A1-A5 uses and up to 1 space per 600sqm GIA for office uses. At least 20% of spaces should have active charging facilities with passive provision for all remaining spaces. For 3% of dwellings at least one designated disabled persons bay per dwelling should be available at the outset with an allowance for an additional 7% of dwellings to be provided with one designated disabled persons space per dwelling in the future.

- 4.130 Draft Local Plan Policy TRC03 (Parking Management) for residential development expects development to provide parking with the standards in Table 23 which advises that up to 0.5 spaces per dwelling will be allowed for development within Opportunity Areas.
- 4.131 The Next Phase complies with the strategic aims of the London Plan to support a modal shift away from travel by car by providing an overall level of residential car parking at a ratio of up to 0.41 parking spaces per residential unit. The ratio of car parking will be consistent across the Next Phase. No dedicated parking is proposed for retail uses as it is assumed these will be linked / bypass trips from occupants from the proposed development and surrounding area and the commercial element will be car free.

Energy and Sustainability

- 4.132 The objective of the planning framework is that major development should be net zero carbon as set out in London Plan Policy SI2 (Minimising greenhouse gas emissions). This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the energy hierarchy set out in policy and a detailed energy strategy is required to demonstrate how the net zero target will be met.
- 4.133 A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 10 per cent, and non-residential development 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided through a cash in lieu contribution, or off-site provision. Development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a Whole Life-Cycle Carbon Assessment.
- 4.134 London Plan Policy SI3 (Energy infrastructure) requires major development proposals within Heat Network Priority Areas to have a communal low-temperature heating system in accordance with the hearing hierarchy. CHP and ultra-low NOx gas boiler communal or district heating systems should be designed to ensure that they meet the requirements of policy SI1 Part B. Where a heat network is planned but not yet in existence the development should be designed to allow for the cost-effective connection at a later date.
- 4.135 Draft Local Plan Policy ECC01 (Mitigating Climate Change) expects development to be energy efficient and be in accordance with policy in the London Plan.
- 4.136 There is an existing legacy heat network serving the buildings on Plot 10, 11 and 12 (as well as other buildings outside the Next Phase), which is not compatible with a modern low temperature heat network and has reached the end of its design life. The existing system is to be decommissioned as the Scheme progresses. The Principal Development Agreement between the Council and the Developer, makes provision to ensure that continuity of heating and hot water is maintained to any part of the Next Phase prior to demolition or any homes on the Estate which is outside the next Phase.
- 4.137 An Energy Assessment that includes an estate wide energy strategy has been prepared for the Next Phase in accordance with the requirements of the London Plan.

- 4.138 The Next Phase follows the London Plan carbon reduction methodology. The base line 'Be-Lean' passive energy saving measures such as low fabric U-values and a low air leakage rate along with Mechanical Ventilation with Heat Recovery deliver a building that performs at least 10% better than current building regulation requirements.
- 4.139 In addition, the Next Phase will provide low carbon heat networks served with Air Source Heat Pumps (ASHP's) as required by the London Plan. The ASHP's have been sized to deliver nearly all of the predicted domestic hot water heat load and predicted to deliver approximately 50% of the sites overall heat demand. The overall effect of these measures is a development that reduces its regulated carbon emissions by 35% over building regulation targets. It is likely that due to the extended programme to deliver the whole of the Scheme, the carbon emission savings will increase further as there is an increase in ASHP efficiency can be expected over the coming years. PV's have been specified to ensure a carbon offset of 35% for the non-domestic buildings.
- 4.140 Where it is not possible to meet the carbon reduction target of net zero carbon with onsite measures, carbon offsetting will be required and details of a cash payment to be made to the local authority at each phase are set out in the s106 agreement.
- 4.141 The Energy Assessment assesses the feasibility of the proposed development connecting into a district heating network for the Colindale area. At the current time it is not feasible to create a wider district heating network. However, the main infrastructure will be sized so that connections can be made to a wider network in the future, should one become available.
- 4.142 At this current time, three Energy Centres are proposed to serve the entire redevelopment of the Next Phase.
- 4.143 At the time of submission of the hybrid planning application there was no requirement to calculate whole life-cycle carbon emissions through a Whole Life-Cycle Assessment. The reserved matters applications are not referable to the GLA, however NHG propose to comply with best practice in terms of whole life-carbon emissions wherever possible in the development of the Next Phase.
- 4.144 The Scheme is compliant with the planning framework to create a net zero carbon development through replacing the existing outdated site wide energy network with new Energy Centres in various phases of the development and via carbon offset payments at various stages in the Scheme.

5. Absence of Planning Impediments to the Development of the CPO Land

Land Interests

- 5.1 There is outline planning permission for the whole of the Next Phase with full planning permission on Plot A, where development has commenced. The first Reserved Matters Applications submitted for the development of Plots H and K has been approved by the Planning Committee. Future RMAs will be submitted in line with the development timetable as set out in Paragraph 4.7 of Ms Lavers Statement. To date the developer has submitted applications that meet planning policy, and it is anticipated that future RMAs will continue to be submitted in line with this and the outline planning permission.
- 5.2 To date the Developer has been proactive in engaging Council officers at each stage of the Scheme, including when completing Stage A of the Scheme. Necessary amendments have been secured expeditiously through the appropriate mechanisms, and the Developer has met its obligations within the Section 106 Agreement (**CDB.6**) in line with the relevant triggers.
- 5.3 Given the successful clearance of past conditions and compliance with the obligations of the Section 106 Agreement (**CDB.6**). I do not consider that the outstanding matters as identified above are likely to present an impediment to the delivery of the Regeneration Project.

6. Highway Stopping up Orders

- 6.1 A number of stopping up orders will be required as a result of the proposed works. Further details are set out at section 6 of Ms Lavers evidence. The stopping up programme and the roads to be stopped up have yet to be agreed between the developer and the Council's highway department. A programme will be developed in accordance with the development timetable and Stopping-Up Orders will be secured prior to construction commencing. The stopping up programme will take into account that access is retained to all occupied properties whilst maintaining delivery of the development.
- 6.2 Based on my experience of stopping up orders confirmed on other estate renewal projects such as West Hendon, Stonegrove and Dollis Valley. I do not consider there to be any likely impediments that would have the potential to prevent these from being confirmed.

7. Objections to the Scheme

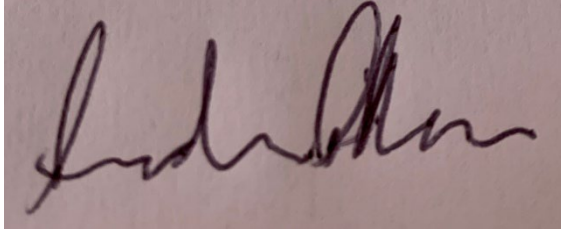
- 7.1 The Secretary of State has received one objection against the confirmation of the Order. The objection relates to the interference with the right to light to the Objector's property. As set out in paragraphs 2.17 to 2.23, daylight and sunlight reports have been prepared and as set out in paragraphs 4.116 to 4.121, the daylight and sunlight amenity of neighbouring properties will comply with planning policy after the development is completed. The detail of the objection is addressed in section 7 of Ms Lavers evidence and section 9 of Mr Smith's evidence submitted in support of this CPO.

8. Conclusion

- 8.1 The redevelopment of the Order Land is the next step in delivering the Regeneration Project which remains a key objective of the Council.
- 8.2 The Proposals for redevelopment of the Order Land are compliant with the Adopted Policy Framework for the area and are not subject to any Planning impediments. They will significantly improve the economic, social and environmental wellbeing of the area and will contribute to the greater benefits that will be secured through completion of the Regeneration Project.

9. Declaration

9.1 I believe that the facts stated in this proof of evidence are true.

A photograph of a handwritten signature in dark ink on a light-colored surface. The signature is cursive and appears to read 'Andrew Dillon'.

Mr Andrew Dillon

dated 7th February 2023

Appendix I

s106 Agreement