



# GREATER LONDON AUTHORITY

## Good Growth

██████████  
Fairview New Homes Ltd

**Our ref:** 2021/0370/P2I

**Date:** 7 June 2021

By email

Dear ██████████

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

**Site: Victoria Quarter, Land Formerly Known as British Gas Works, Albert Road, New Barnet, London, EN4 9SH**

**LPA: London Borough of Barnet**

**Our reference: 2021/0370/P2I**

Further to the pre-planning application meeting held on 12 May 2021, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely



**John Finlayson**  
Head of Development Management

**Victoria Quarter, Albert Road, New Barnet**  
in the London Borough of Barnet

**The proposal**

Redevelopment of the site to provide 547 residential units within 14 buildings ranging from 1 to 8 storeys, including a kiosk building, retail/commercial floorspace, new public realm with communal landscaped amenity areas, basement and surface level car parking, cycle parking and other associated development.

**The applicant**

The applicant is **Fairview New Homes** and **One Housing** and the architect is **EPR Architects**.

**Assessment summary**

- The further housing intensification and optimisation of the site including 35% affordable housing, is supported. The introduction of residential and commercial uses is also supported in land use terms.
- The proposal has a potential to deliver further improvements in terms of urban design and site layout and therefore, alternative architectural typologies and public realm improvements should be further explored. Appropriate density and height of the scheme should be developed in consultation with the Council.
- Advice is given with respect to land use principle, housing, affordable housing, urban design, accessibility of the site and the heights of the proposed buildings, residential quality, inclusive design, heritage, transport and sustainability. The applicant should ensure that any future application addresses these matters to ensure compliance with the London Plan.

**Context**

1. On 12 May 2021, a pre-planning application meeting to discuss a proposal to develop the above site for the above uses was held via MS Teams Video Call with the following attendees:

GLA group

- [REDACTED] Strategic Planner (Case Officer)
- [REDACTED] Team Leader Development Management
- [REDACTED] Urban Design Officer

- [REDACTED] Principal Area Planner (TfL)

Local Authority

- [REDACTED] London Borough of Barnet (Principal Planning Officer)

Applicant

- [REDACTED] Fairview New Homes
- [REDACTED] One Housing
- [REDACTED] EPR Architects
- [REDACTED] EPR Architects
- [REDACTED] Exterior Architects
- [REDACTED] Exterior Architects
- [REDACTED] Exterior Architects

2. The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor’s formal consideration of an application.

**Site description**

3. Formerly the Albert Road Gas Works, the application site is located to the west of Victoria Recreation Ground and to the north of New Barnet town centre within the London Borough of Barnet, and part of the site is within the boundary of the designated town centre. The site, owned by One Housing Group, has been remediated and cleared, and a basement is under construction as per a previous planning consent. The site is bound by a gasworks site to the north, Victoria Recreation Ground to the east, Victoria Road to the south, and a 10-metre planted verge leading up to a railway line to the west.
4. The site is not located within a conservation area nor does it include any statutory or locally listed buildings. There are no conservation areas within the locality of the site, and the nearest heritage asset is the Grade II listed New Barnet (East Barnet Valley) War Memorial on Station Road which is located approximately 180 metres to the south west of the site.
5. The site is located on the A110 East Barnet Road, which is part of the Strategic Road Network (SRN) and 5 kilometres north of the A406 North Circular Road, which is part of the Transport for London Road Network (TLRN). The site is in Zone 5. The closest station is New Barnet, served by Thameslink and Great Northern services, and is approximately 200 metres from the site. The closest London Underground (LU) stations are High Barnet served by the Northern line, 1.4 kilometres to the west, and Cockfosters served by the Piccadilly line, 1.6 kilometres to the east. High Barnet station offers step-free access.
6. The nearest bus stops are on East Barnet Road 100 metres southeast and at New Barnet station 100 metres south, providing access to 8 bus routes which connect to destinations including Chipping Barnet, Cockfosters and Whetstone.

The site has a Public Transport Access Level (PTAL) of 1b to 3 on a scale of 0 to 6b, where 6b represents the highest level of connectivity.

## Case History

7. In 2009, a planning application was referred to the GLA for demolition of existing buildings and erection of a mixed use development comprising 211 residential units, supermarket (10,526sqm gross floor space) and additional 1,893 sqm gross non-residential floor space comprising A1 (shops), A2 (financial and professional services), A3 (restaurants and cafes) and D1 (non-residential uses), public space, car parking, access and related highways works and associated works (GLA reference: 1459; LPA reference B/00200/09). This application was subsequently withdrawn by the applicant.
8. Consent was granted in 2015 for an application put forward by Asda, former owners of the site, for a residential-led, mixed-use development comprising the erection of 305 residential units (Use Class C3), 116 sq.m of retail floorspace (Use Class A1/A2/A3/A4) and 558 sq.m of flexible commercial floorspace (Use Class A3/D1/D2); the creation of new public open space; alterations and additions to existing highways arrangements; the removal of an existing elevated footbridge and the creation of new pedestrian routes; together with associated works including landscaping, provision of basement and surface car parking, servicing and plant area. Relocation of an existing sub-station (GLA reference: 1459a; LPA reference: B/04834/14). This scheme provided an affordable housing contribution of 15%. A basement has been dug and is under construction as part of the implementation of this planning permission. The proposed scheme retains and makes use of this existing basement. Site layout of this permission is as below:

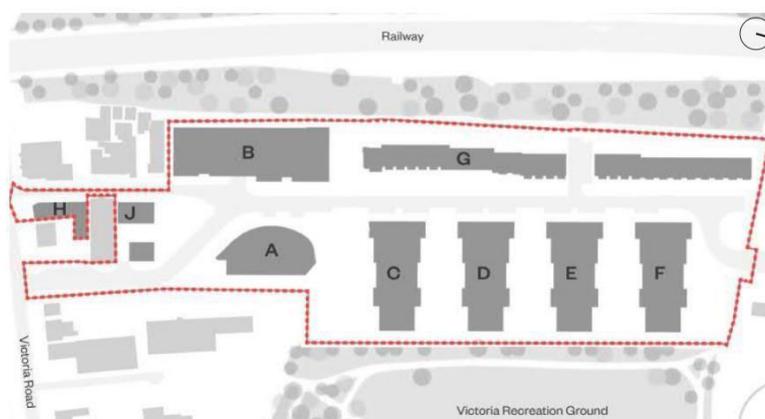


Figure 1: Extant permission for 305 units

9. Subsequently, additional land was acquired, and two more applications were put forward in 2016 and 2017 to increase the number of residential units.
10. Application Ref 16/7601/FUL: a second permission was granted in July 2020 (following completion of legal agreement) for an additional 104 residential units (net increase of 52 units). This application was not referable to the Mayor. The site boundary of this permission is as below:

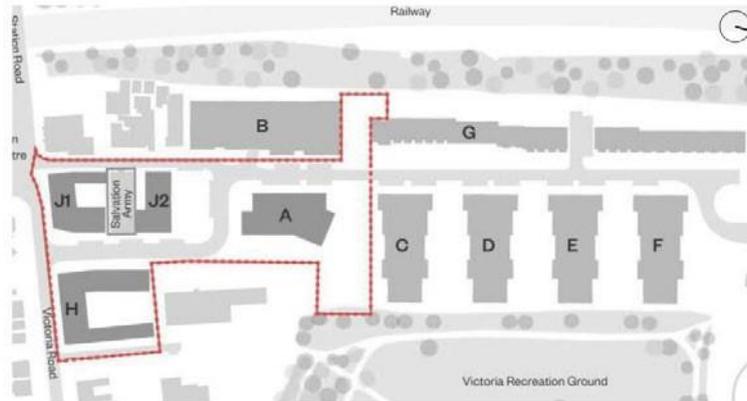


Figure 2: Extant permission for an additional 104 units

11. Application Ref 17/5522/FUL: the third application was granted in July 2020 (following completion of legal agreement) for 39 residential units. This application was not referable to the Mayor. The site layout of this permission and the combined extant permissions is as below:

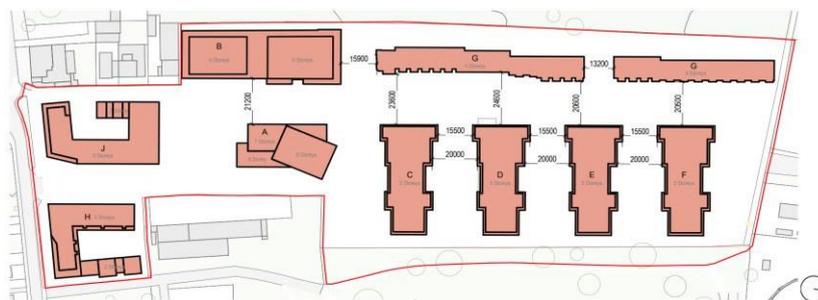


Figure 3: Site layout of combined extant permissions

12. The above combined three extant permissions would provide a total of 371 residential units with 18% affordable housing by habitable room, 618m<sup>2</sup> of mixed use commercial floorspace; and 396 car parking spaces along with the other associated works.
13. GLA officers held pre-application discussions with the applicant in September 2019 to discuss a revised scheme with an increased number of units. The principle of the proposed redevelopment of the site to provide a residential-led mixed use scheme through the optimisation of development on a brownfield site was strongly supported. Nevertheless, any future planning application needed to address issues relating to affordable housing, sustainable development and transport to ensure compliance with the London Plan 2016 and the then Mayor's intend to publish London Plan.
14. Subsequently, a planning application was submitted (GLA reference: 5034; LPA reference: 20/1719/FUL) for 'redevelopment of the site to provide 652 residential units within 14 buildings ranging from 1 to 10 storeys and a single storey Plaza Kiosk building, with 309.6sqm of retail/commercial space and 111.3sqm of community space; new public realm with communal landscaped amenity areas; alterations and additions to existing highways arrangements plus the removal of existing elevated footbridge and creation of new pedestrian routes; 392 car

parking spaces with basement and surface level provision; secure cycle parking; servicing and other associated development'. The GLA issued a Stage 1 report offering broad support for the development, and the Council recommended approval of the planning application. However, the application was refused by the Council's Planning Committee in December 2020, and the Mayor confirmed at Stage 2 that there were no sound reasons for his intervention. This application was refused for the following reasons:

- Excessive height, scale, massing, and density resulting in overdevelopment of the site;
- Impact on the amenity and living conditions of future occupiers;
- No provision of four-bedroom family units; and
- Absence of a Section 106 Agreement to secure planning obligations.

15. The site layout of the refused application is as below:



Figure 4: Site layout of the refused scheme showing 14 blocks

## Details of this proposal

16. The proposal is a joint venture between Fairview New Homes and One Housing Group. The scheme proposes revisions to the refused planning application scheme, involving the redevelopment of the site to provide 547 residential units within 14 buildings ranging from 1 to 8 storeys in height, including a kiosk building, retail/commercial floorspace, new public realm with communal landscaped amenity areas, basement and surface level car parking, cycle parking and other associated development.

17. The proposal seeks following amendments to address the reasons for refusal for the previous scheme:

- Reduction in the quantum of residential units from 652 – 547 (-105 units);
- Reduction in the height of Block A to 8 storeys;
- All remaining blocks designed at 7 storeys or below;
- Amendments to the layout of the flats to optimise orientation;
- Separation distances between building blocks set to a minimum of 20 metres to optimise daylight and sunlight and improve outlook;
- Inclusion of 4-bedroom units;
- Increased quantum of on site play space;
- 615 sq.m. of commercial floor space; and
- 330 parking spaces (270 basement and 53 surface level).

18. The future application is expected to be referable to the Mayor under the following categories of the Mayor of London Order 2008:

- Category 1A: “Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.”
- Category 1B: “Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings—(c) outside Central London and with a total floorspace of more than 15,000 square metres.”
- Category 1C: “Development which comprises or includes the erection of a building of (c) more than 30 metres high and is outside the City of London.

### **Strategic planning issues and relevant policies and guidance**

19. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Barnet Council’s Core Strategy (2012); the Development Management Policies DPD (2013); and, the London Plan 2021.

20. The following are relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance;
- New Barnet Town Centre Framework (2010).

21. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:

- Good Growth London Plan;
- Housing London Plan; Housing SPG; the Mayor’s Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG;
- Affordable housing London Plan; Housing SPG; Affordable Housing and Viability SPG; the Mayor’s Housing Strategy; Good Quality Homes for All Londoners draft LPG;
- Urban design London Plan; Character and Context SPG; Public London Charter draft LPG; Good Quality Homes for All Londoners draft LPG;
- Heritage London Plan;
- Inclusive access London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter draft LPG;
- Sustainable development London Plan; Circular Economy Statements draft LPG; Whole-life Carbon Assessments draft LPG; ‘Be Seen’ Energy Monitoring Guidance draft LPG; Mayor’s Environment Strategy;
- Air quality London Plan; the Mayor’s Environment Strategy; Control of dust and emissions during construction and demolition SPG;

- Ambient noise London Plan; the Mayor's Environment Strategy;
- Transport and parking London Plan; the Mayor's Transport Strategy;
- Biodiversity London Plan; the Mayor's Environment Strategy; Preparing Borough Tree and Woodland Strategies SPG.

## Summary of meeting discussion

22. Following a presentation of the proposed scheme from the applicant's team, meeting discussions covered strategic issues with respect to the land use principle, affordable housing, urban design, and transport. Based on the information made available to date, GLA officer advice on these issues is set out within the sections that follow.

### Land use principle

23. The site was historically a gas works site. However, it is noted that the Stage 1 report for the application reference 1459 (2009) outlined that the site was largely cleared and was last used as a call centre with office space and various outbuildings and surface level car park. GLA officers note that the site was vacant at the time of the grant of the extant consent in 2015. Furthermore, the extant consent has been implemented on the site whereby construction works for the basement are underway. As such, the site has been vacant for some time and is not considered to be in industrial use.
24. London Plan Policy H1 seeks to optimise the potential for housing delivery on suitable brownfield sites. The London Plan sets a strategic target for Barnet to deliver a minimum of 23,640 homes in the Plan period of 2019-2029 as set out in Table 4.1. The proposed redevelopment of the site to provide 547 residential units would contribute towards this target.
25. London Plan Policy SD6 promotes new housing within and on the edges of town centres through mixed-use or residential development that makes best use of land, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport. Furthermore, the site is identified as an opportunity site for residential development in the New Barnet Town Centre Framework.
26. The proposed scheme would deliver a residential-led development on a brownfield site, which has the benefit of an implemented extant planning permission for residential-led development. The principle of further optimisation of the site for residential-led mixed-used development is supported in land use terms in line with London Plan Policies H1 and SD6.

### Housing

27. The proposed scheme would provide circa 547 units and the applicant has provided an indicative breakdown of unit sizes.

#### Affordable housing

28. London Plan Policy H4 seeks to maximise the delivery of affordable housing, with the Mayor setting a strategic target of 50%. At a local level, Barnet's Local

Plan sets a strategic target of 40% affordable housing seeking a tenure split of 60% social/affordable rented units and 40% intermediate housing units.

29. London Plan Policy H5 and the Mayor's Affordable Housing and Viability SPG set out a 'threshold approach', whereby schemes meeting or exceeding a specific percentage of affordable housing by habitable room, without public subsidy, and other criteria such as tenure mix are eligible for the Fast Track Route (FTR). Such applications are not required to submit viability information to the GLA and are also exempted from a late stage review mechanism.
30. As noted above the site was not in industrial use at the time of the extant permission. In addition, the implemented consent (granted in 2015) does not include industrial land re-provision. These are material considerations and therefore, in case of the application site, a minimum of 35% affordable housing by habitable room, without public subsidy, with an acceptable tenure mix and range of affordability levels must be provided to be eligible for the FTR.
31. The proposed scheme of 547 units would deliver 35% affordable housing (by habitable room) with a tenure mix of 60% London Affordable Rent (LAR) and 40% Shared Ownership units.
32. Whilst 35% affordable housing with the proposed tenure split is welcomed and could follow the Fast Track Route provided this is achieved without the use of public subsidy, if public subsidy is included within this offer, the application would not meet the threshold approach, and the proposal would be considered under the viability tested route. Applicants are strongly encouraged to follow the FTR. Where it is accepted that the viability of a site should be considered as part of an application, applicants will be required to pay the GLA's costs for assessing this. An upfront payment of £10,000 plus VAT is required to meet the cost of case officer project management, specialist viability officer review and management team input. This relates to the GLA's assessment of an application at Stage 1 and Stage 2 of the referral process, including consideration of the Section 106 agreement and viability review clauses.
33. Any application should include details of the affordable rent levels or the income thresholds associated with any intermediate units. This must confirm that the proposed rent levels are either in line with social rent levels or in line with London Affordable Rent levels and benchmark rent levels must be detailed for each unit size. In accordance with paragraph 4.6.8 of the London Plan, the intermediate homes should be available to people on a range of incomes below the maximum household income, which is currently £90,000 and updated annually in the London Plan Annual Monitoring Report (AMR). Once agreed, these ranges and rent levels must be secured within any Section 106 agreement.
34. An early stage viability review would be triggered if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the Council). A late stage review would also be required if the application does not follow the FTR. GLA officers request early engagement into the wording of the draft Section 106 agreement to ensure appropriate wording for review mechanisms, as well as obligations around phasing and delivery of affordable housing.

## Housing choice

35. London Plan Policy H10 encourages a full range of housing choice and states that for low cost rent housing boroughs should provide guidance on the size of units required to ensure affordable housing meets identified needs.
36. The proposal includes 33% one-bedroom units, 45% two-bedroom units, 19% three-bedroom units and 3% four-bedroom units. The proposal includes a higher proportion of one and two bedroom units in relation to local plan policy, and so the applicant is advised to establish an appropriate unit mix as required by the Council.
37. Any application should provide a breakdown of the sizes of the units, including the proposed affordable units. The applicant is encouraged to provide family sized units as affordable rent units. A schedule of accommodation outlining unit types, sizes and habitable rooms should be provided with any application.

## Children's play space

38. London Plan Policy S4 seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 sq. m. per child and that is not segregated by tenure. Further detail is provided in the Mayor's Supplementary Planning Guidance 'Shaping Neighbourhoods: Play and Informal Recreation', together with a play space requirement calculator, available [here](#). Any application should seek to meet the child play space requirements on site for children under 12 years old on site. Play space for 12+ years may be accommodated in identified suitable provision nearby.
39. The pre-application submission outlines that 1135 sq.m. of play space for children aged 0 – 4 years would be provided on site. It is understood that the overall play space provision for age groups would be below the minimum requirements set out by London Plan Policy S4. As a minimum, the requisite amount of play space for 0-4 year olds must be provided on site. It is noted that the site is adjacent to a public park which could provide safe and accessible playspace for older children, subject to appropriate financial contribution towards this space. The applicant must demonstrate that all play space within the site will be available to all children within the development and not segregated by tenure type, in accordance with Policy S4. The ongoing availability of all play space to all children in the development must be secured by appropriate conditions of approval in a future application.

## **Urban design**

### Optimising development capacity and site layout

40. London Plan Policy D3 encourage the optimisation of sites, having regard to local context, design principles, public transport accessibility, and capacity of existing and future transport services. The higher the density of a development, the greater the level of design scrutiny that is required, particularly qualitative aspects of the development design, as described in London Plan Policy D4.
41. The overall layout of the proposed development remains broadly similar to the previous application comprising of fourteen buildings; however, the scale of the buildings has been reduced in response to the reasons for refusal on the

previous scheme. The proposal now includes larger outdoor amenity and public realm areas and would maintain a separation distance of 20 metres between building blocks. The height of the buildings has also been reduced and Block A would be the tallest element of the development with a height of 8 storeys. The reduction in scale has consequently reduced the quantum of residential units by circa 100 units.

42. GLA officers welcome the proposed changes to the massing of the blocks which reduce their apparent bulk and scale and improves residential quality by increasing separation between habitable room windows. Nevertheless, it is noted that the site layout remains broadly similar to the previous scheme, and as explored further below, officers consider that there is now scope to explore alternative layouts and architectural typologies to find an optimal design solution for the site.
43. The proposed surface level parking strategy along the main access road compromises the quality of the public realm and definition to building entrances. The need for surface level parking is questioned and the applicant should explore reducing the quantum of parking at street level.
44. The approach from the south to the north and creation of pedestrian paths is legible, however, the proposal does not clearly define a pedestrian route while Block A appears to restrict the quality of pedestrian routes and, the proposal lacks defined pedestrian routes at the entrance of the site. Consideration should be given to improvements of pedestrian routes and maximising widths of paths within the development to ensure free and safe pedestrian movements.
45. The block layout and architectural typologies appear regimental in character and the proposed courtyards lack definition between public and private spaces. The scale of the courtyard buildings could create windy outdoor spaces. While it is clear the design team have given thought to the developing architecture, officers consider that there is scope for greater ambition in the architecture and urban design, and greater variety in typologies, particularly for the central courtyard buildings. It is critical that design interventions respond to the built environment context, including the character and materiality of existing surroundings. The design team should explore introducing mews type buildings to create maisonettes or perimeter blocks to better define the courtyard buildings, outdoor amenity spaces and east and west links of the site. Such an approach would help create a stronger sense of place, weaving together the different elements of the scheme in a convincing spatial narrative.
46. The proposed development includes removal of an elevated bridge and creation of a new pedestrian route to the west of the site. The submission documents do not include detailed drawings to demonstrate how this will be integrated into the site. Further information on the footbridge access is required. Furthermore, the applicant should continue to explore how its scheme can improve the permeability of the wider area along with visual information to support its proposed public realm strategy.
47. The proposed scheme would have high density and whilst GLA officers are of a view that the site can in principle accommodate high-density development, the aspiration to build densely needs to be balanced with an environment that supports the quality of life of local and nearby residents. To achieve an optimum

density for the development, it is important that the design of the scheme is approached by first considering the quality of spaces and the outlook from the flats to deliver the highest design and residential quality. In line with Policy D4, the proposed scheme should be robustly scrutinised, and the applicant should seek a DRP review on the final proposal. In addition, a management plan detailing day-to-day servicing and delivery arrangements and long-term maintenance implications, as detailed in paragraph 3.4.9, will be required. The agreed maintenance plan should be secured by condition as part of any planning permission.

### Height and massing

48. London Plan Policy D9 states that tall buildings should only be developed in locations identified as suitable in development plans and requires that development proposals for tall buildings should address their visual, functional, environmental and cumulative impacts. The proposed buildings would range between 1 – 8 storeys in height.
49. Barnet's Core Strategy defines a tall building as being eight storeys (equivalent to 26 metres above ground level) or more and identifies locations where proposals for tall buildings may be appropriate. In this case, given that the proposal includes buildings ranging up to 8 storeys, the heights proposed would be considered as tall buildings as per Local Plan policy. The application site is not located in an area which is identified as being appropriate for tall buildings. As such, the proposal would not comply with the locational requirements of London Plan Policy D9 (B).
50. Whilst GLA officers note that the site is not located within areas identified as suitable for tall buildings, the extant scheme comprises of a building up to 8 storeys in height and therefore, the principle of tall buildings in this location has been established. In addition, the application site is in an area of changing character and has been identified as an opportunity site by the Council. It is also noted that the Council officers have previously supported the provision of up to 10 storeys on the site and considered its townscape impact acceptable.
51. Although, the application site would not comply with the locational requirements of London Plan Policy D9 (B), in this instance, given the planning history and context, GLA officers are of the view that a case may be made for the proposed height and massing as being suitable for the site, subject to a full assessment of the future planning application against Part C of Policy D9, including the proposed architectural design, and the supporting Townscape Visual Impact Assessment and Heritage Assessment to justify how the scheme could be considered acceptable in this location. Careful consideration of microclimate impact and sunlight/daylight penetration is also required to ensure that the proposed height and massing would not overshadow public realm areas for longer periods of time and would not impact on daylight amenity of the proposed and neighbouring properties. The applicant is advised to continue to work closely with the Council to establish appropriate heights. Ultimately an issue of non-compliance with Policy D9(B) would need to be considered in the context of the scheme's performance against the London Plan as a whole, as well as all other relevant material considerations and public benefits.

### Residential quality

52. London Plan Policy D6 promote quality in new housing provision, with further guidance provided in the Mayor's Housing SPG. The requirements of these policies should be reflected in the final layout of the residential units to ensure the residential units are of the highest quality. Minimum quantitative standards for private internal space, private outdoor space and floor to ceiling heights apply to all tenures and types of self-contained housing in Class C3 use within London. In addition, the provision of dual aspect units should be maximised, and single aspect units only provided where these units would constitute a more appropriate design solution in terms of optimising the capacity of a particular site whilst ensuring good design. Potential issues associated with single aspect units in terms of passive ventilation, privacy, daylight, overheating and noise should also be appropriately addressed. North facing single aspect units, which contain three or more bedrooms or are exposed to significant noise impacts should be avoided.
53. The layout of the scheme is broadly similar to the previous scheme. The proposed development would have an efficient core to unit ratio and large proportion of dual aspect units. The increased separation distance between the buildings would provide an improved outlook to the proposed residential units, which is welcomed. Further details should be provided to demonstrate the scheme's overall compliance with these quantitative and qualitative standards, including the mitigation proposed for residential units required to address any noise and disturbance from the railway line.
54. The applicant should ensure that the scheme is tenure blind in terms of the external appearance and residential quality of both private and affordable units, and the shared amenity space should be accessible by all residents. All units must comply with the nationally described space standards.

### Architectural quality

55. The intended scale/density of the proposal will require exceptional attention to detail and architectural quality. Information on the proposed design, quality of materials and architectural detail should be provided with any planning application.

### Fire safety

56. In line with London Plan Policy D12 the future application should be accompanied by a fire statement, prepared by a suitably qualified third party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.
57. Further to the above, Policy D5 within the London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the buildings.

### Inclusive access

58. Policy D3 of the London Plan seeks to ensure that new development achieves the highest standards of accessible and inclusive design (not just the minimum). The future application should ensure that the development: can be entered and used safely, easily and with dignity by all; is convenient and welcoming (with no disabling barriers); and, provides independent access without additional undue effort, separation or special treatment.
59. Policy D5 of the London Plan requires that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. The applicant would provide 10% of the rooms as wheelchair accessible, which would be acceptable.
60. The future application should include plans that show where the wheelchair accessible homes would be located and how many there would be. These should be distributed across tenure types and sizes to give disabled and older people similar choices to non-disabled. This information and typical flat layouts and plans of the wheelchair accessible homes should be included in the design and access statement. The Council should secure M4(2) and M4(3) requirements by condition as part of any permission.

### Digital infrastructure

61. London Plan Policy SI6 promotes provision of digital infrastructure and requires development proposals to ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments. The applicant should demonstrate that sufficient ducting space is available within the development as part of any future application.

### Heritage impact

62. The site is not located within a conservation area. The site is not located in close proximity to the nearest heritage asset (the Grade II listed New Barnet (East Barnet Valley) War Memorial on Station Road), and therefore the proposal is unlikely to have an impact on this heritage asset. However, any application should include verified views as part of a Heritage, Townscape and Visual Impact Assessment, to enable officers to fully assess the impact level on heritage assets in accordance with the NPPF and London Plan policies.

## **Transport**

63. TfL provided technical advice in relation to previous application, which was supported by a Transport Assessment in accord with Healthy Streets Transport Assessment guidance. A revised Transport Assessment to be updated to reflect both local highway and TfL's advice should be submitted with any planning application, which should set what mitigation is being offered. Officers recommend that a scope to update the Transport Assessment should be sent to TfL prior to submission of the application for review.
64. It is important that TfL officers have the opportunity to assess the impact on public transport capacity (station, line, and bus network). Specifically, officers will need

to reassess bus demand, and consider whether the infrastructure proposals previously discussed are sufficient or whether funding to increase bus service frequency is required.

65. It is recommended to undertake Healthy Streets assessment for the new public realm and routes being provided on site and that a Healthy Streets Designers Check is submitted with the application and appended to the Transport Assessment.

## **Sustainable development**

### Energy strategy

66. Applicants should follow the [GLA Energy Assessment Guidance 2020](#) which sets out the information that should be provided within the energy assessment to be submitted at planning application stage.

### Net zero carbon target

67. The London Plan 2021 requires all major developments (residential and non-residential) to meet a net-zero carbon target. This should be met with a minimum on-site 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations with any carbon shortfall to net zero being paid into the relevant borough's carbon offset fund.
68. Applicants should submit a completed [Carbon Emissions Reporting spreadsheet](#) alongside the planning application to confirm the anticipated carbon performance of the development and should clearly set out the carbon emission factors they are proposing to use in their energy assessment. Although results for both sets of carbon emission factors should be submitted, applicants are encouraged to use the SAP 10.0 carbon emission factors for referable applications when estimating carbon dioxide emission performance against London Plan policies. For developments in Heat Network Priority Areas with the potential to connect to a planned or existing district heating network (DHN) the SAP 2012 emission factors may be used provided that the heat network operator has developed, or is in the process of developing, a strategy to decarbonise the network which has been agreed with the GLA.
69. The carbon emission figures should be reported against a Part L 2013 baseline. Sample SAP full calculation worksheets (both DER and TER sheets) and BRUKL sheets for all stages of the energy hierarchy should be provided to support the savings claimed.

### Be Lean

70. Applicants are expected to meet the London Plan energy efficiency targets:

- a. **Residential** – at least a 10% improvement on 2013 Building Regulations from energy efficiency measures alone
- b. **Non-residential** – at least a 15% improvement on 2013 Building Regulations from energy efficiency measures alone

71. It is noted the previous application did not meet the Be Lean targets; the applicant is required to ensure that the design meets the Be Lean targets for this application.

72. Applicants are expected to design buildings to be able to meet all energy policy areas. They should consider how building form is contributing to the meeting of energy policy targets. Applicants are required to consider the suitability of other design areas which may be negatively impacting the energy consumption and overheating risk of the proposed development.
73. The applicant will be expected to consider and minimise the estimated energy costs to occupants and outline how they are committed to protecting the consumer from high prices. See the guidance for further detail.

#### Energy flexibility

74. Applicants will be expected to investigate the potential for energy flexibility in new developments, include proposals to reduce the amount of capacity required for each site and to reduce peak demand. The measures followed to achieve this should be set out in their energy assessment. See the 2020 guidance for further details. Thermal as well as electrical storage measures should be considered.

#### Cooling and overheating

75. The Good Homes Alliance (GHA) Early Stage Overheating Risk Tool should be submitted to the GLA alongside the planning application to identify potential overheating risk and passive responses early in the design process.
76. Evidence should be provided on how the demand for cooling and the overheating risk will be minimised through passive design in line with the cooling hierarchy. Dynamic overheating modelling in line with CIBSE Guidance should be carried out (TM59 for residential and TM52 for non-residential) for all TM49 weather scenarios.
77. The area weighted average (MJ/m<sup>2</sup>) and total (MJ/year) cooling demand for the actual and notional building should be provided and the applicant should demonstrate that the actual building's cooling demand is lower than the notional.

#### Be Clean

78. The applicant should investigate opportunities for connection to nearby existing or planned district heating networks (DHNs). Where such opportunities exist, this should be the priority for supplying heat to the site in line with the London Plan heating hierarchy. Evidence of this investigation should be provided including evidence of active two-way communication with the network operator, the local authority and other relevant parties. This should include information on connection timescales and confirmation that the network has available capacity. See the guidance for full details on the information to be provided.
79. The site should be provided with a single point of connection and a communal heating network where all buildings/uses on site will be connected. Relevant drawings/schematics demonstrating the above should be provided.
80. The applicant should provide evidence confirming that the development is future proofed for connection to wider district networks now or in the future, where an immediate connection is not available.
81. Where a DHN connection is not available, either now or in the future, applicants should follow the London Plan heating hierarchy to identify a suitable communal heating system for the site.

82. The London Plan limits the role of CHP to low-emission CHP and only in instances where it can support the delivery of an area-wide heat network at large, strategic sites. Applicants proposing to use low-emission CHP will be asked to provide sufficient information to justify its use and strategic role while ensuring that the carbon and air quality impact is minimised.

### Be Green

83. All major development proposals should maximise opportunities for renewable energy generation by producing, using, and storing renewable energy on-site. This is regardless of whether the 35% on-site target has already been met through earlier stages of the energy hierarchy.

84. Solar PV should be maximised; the applicant proposes this and is seeking to fully exploit both the roof (with low angle E/W panels) and potentially considering BIPV as well. This is welcomed. Applicants should submit the total PV system output (kWp) and a plan showing that the proposed installation has been maximised for the available roof area and clearly outlining any constraints to further PV.

85. ASHPs were proposed for the previous application. Should heat pumps be proposed, the applicant will be expected to demonstrate a high specification of energy efficiency measures under Be Lean, a thorough performance analysis of the heat pump system and, where there are opportunities for DHN connection, that the system is compatible. The detail submitted on heat pumps should include:

- a. An estimate of the heating and/or cooling energy (MWh/annum) the heat pumps would provide to the development and the percentage of contribution to the site's heat loads.
- b. Details of how the Seasonal Coefficient of Performance (SCOP) and Seasonal Energy Efficiency ratio (SEER) has been calculated for the energy modelling. This should be based on a dynamic calculation of the system boundaries over the course of a year i.e. incorporating variations in source temperatures and the design sink temperatures (for space heat and hot water).
- c. The expected heat source temperature and the heat distribution system temperature with an explanation of how the difference will be minimised to ensure the system runs efficiently. The distribution loss factor should be calculated based on the above information and used for calculation purposes.
- d. Whether any additional technology is required for top up or during peak loads (e.g. hot water supply) and how this has been incorporated into the energy modelling assumptions.

86. Should an ambient loop heat network be proposed, the applicant will be required to engage with local DHN stakeholders and demonstrate that proposals will be compatible and commercially viable for future connection to district heating.

### Carbon offsetting

87. The applicant should maximise carbon emission reductions on-site. Should the site fall short of the carbon reduction targets and clearly demonstrate that no further carbon savings can be achieved, the applicant would be required to make a cash-in-lieu contribution to the boroughs' carbon offset fund using the GLA's recommended carbon offset price or, where a local price has been set, the borough's' carbon offset price.
88. Energy strategies should provide a calculation of the shortfall in carbon emissions and the offset payment that will be made to the borough.

### Whole Life-Cycle Carbon Assessment

89. In accordance with London Plan Policy S112 the applicant will be expected to calculate and reduce whole life-cycle carbon emissions to fully capture the development's carbon footprint. The applicant should submit a whole life-cycle carbon assessment to the GLA as part of the Stage 1 application submission, following the Whole Life-Cycle Carbon Assessment Guidance and using the GLA's reporting template. The applicant will also be conditioned to submit a post-construction assessment to report on the development's actual WLC emissions. The assessment guidance and template are available on the GLA [website](#).

### Be Seen

90. The applicant will be expected to monitor their development's energy performance and report on it through an online monitoring portal. The applicant should review the 'Be Seen' energy monitoring [guidance](#) to ensure that they are fully aware of the relevant requirements to comply with the 'Be Seen' policy. The applicant should provide a commitment that the development will be designed to enable post construction monitoring and that the information set out in the 'Be Seen' guidance is submitted to the GLA's portal at the appropriate reporting stages. This will be secured through suitable legal wording.

### Urban greening

91. London Plan Policies G1 and G5 embed urban greening as a fundamental aspect of site and building design. Features such as street trees, green roofs, green walls, rain gardens, wildflower meadows, and hedgerows should all be considered for inclusion and the opportunity for ground level urban greening should be maximised.
92. The applicant should explore opportunities to create green links to the local green network surrounding the site in accordance with London Plan Policy G1. Proposals such as the 'Park Transition' character area are considered positive features in this regard.
93. The applicant should provide evidence with any planning application that the proposed development secures a net biodiversity gain in accordance with London Plan Policy G6(D).
94. The applicant must calculate the Urban Greening Factor (UGF) score for the proposed development and meet the minimum specified target of 0.4 as set out in London Plan Policy G5. A drawing showing the surface cover types and accompanying UGF calculation should be submitted at planning application

stage. A landscaping plan should also be provided. Guidance regarding the UGF can be found [here](#).

95. It is recommended the applicant undertake the UGF calculation at the earliest opportunity to understand whether the UGF of 0.4 is being achieved, in order to make necessary design changes to maximise urban greening.
96. In accordance with London Plan Policy G7, the proposed development should ensure that, wherever possible, existing trees of quality are retained. Where it is imperative that trees are removed, there should be adequate replacement based on the existing value of the trees determined by i-tree or CAVAT (or another appropriate valuation system).

#### Flood risk management

97. The application site is located in Flood Zone 1 but is larger than 1 hectare in size, and therefore a Flood Risk Assessment (FRA) will be required with the planning application. It is understood that the Pimms Brook runs culverted beneath the site. Every effort should be made to incorporate and improve this asset within the development proposals. The flood zone 3 extents from the Pimms Brook are located adjacent to the eastern site boundary at the point where it is culverted. The risk of flooding from the brook needs to be assessed, with appropriate mitigation measures incorporated. The FRA should assess all sources of flood risk as required by London Plan Policy SI.12, taking note to not displace floodwater off site. Where the site is found to be at medium or high risk of flooding from at least one source, the FRA should also consider the need for flood resilience and emergency planning measures.

#### Sustainable drainage

98. The drainage strategy should aim to reduce surface water discharge from the site to Qbar greenfield rates in accordance with London Plan Policy SI.13. The drainage strategy should maximise opportunities to use Sustainable Drainage System (SuDS) measures at the top of the drainage hierarchy set out in Policy SI.13. Roofs and new public realm areas present an opportunity to integrate SuDS such as rainwater harvesting, green and blue roofs, tree pits, rain gardens, and permeable paving into the landscape, providing amenity, water quality, and biodiversity benefits. Rainwater harvesting for re-use and/or irrigation should be incorporated in line with the London Plan drainage hierarchy.
99. A maintenance and management plan for proposed drainage and SuDS features should be provided, with the planning application as well as a plan demonstrating that exceedance flood flow routes above the design 100 year event plus 40% climate change have been considered. The applicant should ensure that the London Borough of Barnet's version of the London Sustainable Drainage Proforma is completed and accompanies the planning application. The proformas for all Local Authorities can be found [here](#).

#### Water use

100. For residential uses, the development should have a maximum indoor water consumption of 105 l/person/day, in line with London Plan Policy SI.5. 2. For non-residential uses, the development should achieve the equivalent of an 'Excellent' rating on the water elements of BREEAM, in line with London Plan

Policy SI.5. 3. Water reuse should be included in the development to meet both water efficiency and sustainable drainage requirements.

### Circular economy

101. The London Plan has introduced circular economy policies including a requirement to submit Circular Economy Statements for developments. The GLA has released draft guidance for developers on how to prepare Circular Economy Statements and a 'Design for a circular economy' Primer that helps to explain the principles and benefits of circular economy projects.
102. London Plan Policy SI7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, whilst Policy D3 requires development proposals to integrate circular economy principles as part of the design process.
103. Therefore, the applicant is required to submit a Circular Economy Statement in accordance with the GLA [guidance](#).

### **Environmental issues**

#### Air quality and ambient noise

104. Given the close proximity of the site to the railway line, a robust air quality assessment and noise impact assessment should be submitted with the planning application.

### **Conclusion**

105. The further housing intensification and optimisation of the site including 35% affordable housing, is supported. The introduction of residential and commercial uses is also supported in land use terms.
106. The proposal has a potential to deliver further improvements in terms of urban design and site layout and therefore, alternative architectural typologies and public realm improvements should be further explored. Appropriate density and height of the scheme should be developed in consultation with the Council.
107. Advice is given with respect to land use principle, housing, affordable housing, urban design, accessibility and permeability of the site and the heights of the proposed buildings, residential quality, inclusive design, heritage, transport and sustainability. The applicant should ensure that any future application addresses these matters to ensure compliance with the London Plan.

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