

# WEST HENDON

## PLANNING POLICY STATEMENT

June 2013 Addendum

Quod





**West Hendon, Barnet**

**Planning Policy Statement  
Addendum**

**Document 4.3**

June 2013

Our Ref: Q10102

## Contents

1.	INTRODUCTION .....	1
2.	LONDON BOROUGH OF BARNET ADOPTED UDP (MAY 2006) SAVED POLICIES (MAY 2009) .....	3
3.	BARNET CORE STRATEGY .....	15
4.	BARNET DEVELOPMENT MANAGEMENT POLICIES.....	25
5.	THE LONDON PLAN, SPATIAL DEVELOPMENT STRATEGY FOR GREATER LONDON, JULY 2011.....	33

# 1 INTRODUCTION

1.1 Quod is instructed by Barratt Metropolitan to submit a Planning Policy Addendum (Document 4.3A) to the March 2013 Quod Planning Policy Statement (Document 4.3) submitted in support of the hybrid planning application reference H/01054/13 which was validated by LBB on 18th March 2013. The application seeks part detailed planning permission (“Detailed”) and part outline planning permission (“Outline”) for the following development:-

**“The demolition and redevelopment of the West Hendon Estate to accommodate up to 2000 residential units, a new 2 form entry primary school, community uses, commercial uses and associated open space and infrastructure comprising:**

- **Outline submission for the demolition of existing buildings and the construction of up to 1,642 new residential units (Class C3); up to 3,870m<sup>2</sup> (GEA) of D1 Class floorspace comprising nursery and primary school and community centre uses and up to 1,635m<sup>2</sup> (GEA) Class A1/A2/A3/A4/A5/B1 floorspace, within buildings ranging from 2 to 29 stories, associated cycle and car parking provision including basement level parking, landscaping and public realm works, interim works, associated highway works, and two pedestrian bridges across the Welsh Harp.**
- **Full planning submission (Phase 3 Blocks G1, G2, E1, E2, E3, E4) for the construction of 358 new residential units (Class C3), and 131m<sup>2</sup> (GEA) Class A1/A2/A3/A4/A5/B1 floorspace, within buildings ranging from 5 to 26 stories, cycle and car parking provision including basement level parking, associated landscaping and public realm works, associated highway works, energy centre, and interim works”.**

1.2 The fundamentals of the planning application submission remain, and therefore this document should be read alongside the Planning Policy Statement (Document 4.3), originally submitted with the planning application. This Statement provides further commentary as to how the planning application has addressed the strategic relevant Barnet and GLA development plan policies.

1.3 This document does not seek to assess every planning policy in existence as clearly there are a significant number of development plan policies and their remit is far reaching. Rather, it seeks to review the key strategic policies relevant to estate regeneration and the fundamentals that these are based on.

1.4 Section 38(6) of the Planning and Compensation Act 2004 states:

**“If regard is to be had to the development plan for the purposes of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.”**

1.5 The Development Plan for the purposes of this review is the Saved Policies of the London Borough of Barnet UDP; the adopted Barnet Core Strategy; the adopted Development Management Policies DPD and the adopted London Plan (Spatial Development Strategy for Greater London), July 2011. Material considerations consist of the adopted National Planning Policy Framework.

## 2 LONDON BOROUGH OF BARNET ADOPTED UDP (MAY 2006) SAVED POLICIES (MAY 2009)

- 2.1 Barnet's UDP was adopted on 18 May 2006. Under the Planning and Compulsory Purchase Act 2004, the policies within the document were automatically saved for a period of three years from the date of adoption. After this period the Council were obliged under Direction of the Secretary of State to seek official approval to save specific policies within the UDP. In May 2009 the Secretary of State Directed the Council to save certain policies and delete others.
- 2.2 The majority of saved policies were superseded following the approval of the DPM DPD (September 2012) and these are identified in Appendix C of the Core Strategy.
- 2.3 However, an exception has been made in respect of those policies which relate to the Brent Cross – Cricklewood (under which the West Hendon site falls). Section 1.4 of the Core Strategy and section 1.4 of the DPM DPD explains this relationship further.
- 2.4 The Barnet Development Framework was prepared in parallel with the development of UDP policies on Brent Cross – Cricklewood. These policies are as listed in Appendix A of the Core Strategy. This suite of UDP policies were saved by the Direction issued by the Secretary of State on May 13 2009. In view of the progress that has been made towards the implementation of the saved UDP policies on Brent Cross – Cricklewood Barnet the Council considered that it is inappropriate to replace them. In order to provide a policy framework to secure the future comprehensive redevelopment of Brent Cross Cricklewood the 'saved' policies will continue to operate until it is considered appropriate to replace them. These policies within the saved UDP continue to be part of the development plan.
- 2.5 The Council therefore intended that the Development Management policies will not apply to the development of the Brent Cross Cricklewood Regeneration Scheme unless and until the Core Strategy or this DPD is reviewed (or a further local development document is adopted which has the effect of applying any such DM policies to that scheme) in accordance with the monitoring and review process outlined in the Core Strategy at Policy CS2 and at section 20.13.

2.6 The relevant policies are set out below.

### Appendix A – Brent Cross – Cricklewood

Suite of 'Saved' UDP Policies on Brent Cross – Cricklewood	
Policy GCrick	Cricklewood, Brent Cross and West Hendon Regeneration Area
Policy C1	Comprehensive Development
Policy C1(A)	West Hendon
Policy C2	Urban Design – High Quality
Policy C3	Urban Design – Amenity
Policy C4	Sustainable Design
Policy C5	West Hendon and Cricklewood Town Centres
Policy C6	Brent Cross New Town Centre
Policy C7	Transport Improvements
Policy C8	Parking Standards
Policy C9	Housing and Community Development
Policy C10	Employment
Policy C11	Implementation

2.7 It is our consideration that the area referenced as Brent Cross – Cricklewood is that as defined at Page 6 of the 2005 Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework and that area defined on the Proposals Map as Cricklewood Regeneration Area and therefore West Hendon is subject to the terms set out in Section 1.4 of the Core Strategy and Section 1.4 of the DPM DPD i.e that these policies relate to any planning application for West Hendon, and supersede more recent Development Management Policies (where relevant).

**a) Site Allocation - Proposals Map**

2.8 The Barnet Proposals Map allocates the West Hendon Estate as follows:-

- Cricklewood Regeneration Area
- Special Advertisement Control
- Site of Metropolitan Importance for Nature Conservation
- Metropolitan Open Land
- A main retail frontage
- Site of Special Scientific Interest



- Specific Proposal Site

2.9 These allocations and their relevance to the planning application have been addressed within the respective planning submission documents. Whilst the development footprint of the site sits outside of the main ecological land use allocations, the red line of the planning application does cross these owing to the inclusion within the red line two pedestrian bridges across the Silk Stream and alongside Cool Oak Lane vehicular bridge.

2.10 The allocation within the Cricklewood, Brent Cross and West Hendon Regeneration Area remains the principal allocation for the site.

**b) Strategic Policy**

2.11 Policy GCRICK represents the strategic policy for the locality and confirms the following:-

**“Policy GCRICK - Cricklewood, Brent Cross and West Hendon Regeneration Area**

**The Cricklewood, Brent Cross and West Hendon regeneration area, as defined on the Proposals Map, will be a major focus for the creation of new jobs and homes, building upon the area’s strategic location and its key rail facilities. All new development will be built to the highest standards of design as well as to the highest environmental standards. A new town centre, developed over the plan period, will be fully integrated in the regeneration scheme.”**

2.12 Unlike the Cricklewood and Brent Cross Area, West Hendon is not identified as an opportunity area within the London Plan. It therefore sits outside of the policy aspiration for redevelopment of Brent Cross as a town centre. Reference to ‘a new town centre’ within Policy GCRICK therefore needs to be read in this context.

2.13 Policy GCRICK is met by this application as it delivers regeneration through economic and housing investment through high standards of design and environmental standards to build upon the area’s strategic location and key rail facilities. Enhanced retail facilities within the West Hendon Broadway local shopping centre will also deliver integrated regeneration with the new residential uses and Primary School which form the predominant land uses of this planning application.

c) **Detailed Policies**

- 2.14 Appendix A of the Core Strategy confirms 12 detailed policies which are those set out in Chapter 12 of the UDP - Cricklewood, Brent Cross and West Hendon Regeneration Area (replicated as **Appendix 5**).
- 2.15 *Policy C1 – Comprehensive Development* confirms that the council will seek the comprehensive development of the Cricklewood, Brent Cross and West Hendon Regeneration Area in accordance with the adopted Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework and delivery strategy. Development proposals will be supported if they are consistent with policies of the UDP and their more detailed elaboration in the development framework.
- 2.16 The adopted Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework and delivery strategy is a 2005 document and therefore is subject to some degree of evolution since original adoption. The West Hendon Estate comprises the north west sector of the regeneration area, and therefore much of the document is naturally focused upon the main Brent Cross site. However the principles for good quality sustainable development exist to deliver an enhanced quality of life for existing and future residents. A new York Park is envisaged as part of the redevelopment proposals to provide open space better suited to residents’ needs, with links through to a new civic square and The Broadway, which is an integral part of this application. The poor quality condition of the existing housing is also recognised.
- 2.17 Fundamentally the document notes that:-

**“West Hendon**

**At West Hendon it is proposed that approximately 2,200 units will be provided.**

**The guidelines relating to affordable housing above do not apply to West Hendon. In this case, the existing affordable housing must be replaced by an equivalent amount, type and mix of new affordable housing funded by private sector investment to meet the Decent Homes Standard and therefore requires a site specific solution.**

**It is recognised that in order to fund the re-provision, the density of development at West Hendon will be increased. The precise quantum will be subject to detailed design given the sensitive location adjacent to the Welsh Harp Reservoir”.**

- 2.18 This principle has been followed by the proposals, and whilst the “existing” housing needs have evolved over the last 8 years and are reflected in the submission, an equivalent quantum of affordable housing remains to reflect that on site as present.
- 2.19 The document also contains the following objectives that have been addressed as part of this application:-
- An existing SSSI that will require a management plan to be formulated as part of any proposals for redevelopment at West Hendon to protect the natural character and encourage bio-diversity. It is important that human disturbance of natural habitats is minimised, but education and enjoyment of this unique resource is stimulated.
  - A new and remodelled open space to form a buffer between a redeveloped West Hendon Estate and the Welsh Harp Reservoir.
  - A new Square at the heart of the revitalised West Hendon local centre.
  - Capacity restraints will be relieved in West Hendon town centre by the widening of the A5 and junction improvements.
  - A new residential quarter will be created around the Welsh Harp Reservoir. There will be improved access for pedestrians and cyclists between the new local centre, the new homes, the Welsh Harp and Hendon Station.
- 2.20 Paragraph 12.3.3 of Chapter 12 of the UDP goes onto confirm that the housing-led regeneration of West Hendon may progress separately from Cricklewood and Brent Cross. It is recognised that the adopted Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework, December 2005 is a material consideration and does not constitute development plan policy. Paragraph 12.3.4 confirms that West Hendon is an integral part of the regeneration area. Its boundaries are broadly defined by the Welsh Harp Arm of the Brent Reservoir in the west, and the Midland Mainline Railway in the east. The northern and southern boundaries are approximate to the extent of the existing residential area either side of the A5 Edgware Road.

2.21 Paragraph 12.3.5 goes on to confirm that the present West Hendon Housing Estate consists of a variety of dwelling types, where the majority are in poor condition. The Broadway Shopping Area is also of poor quality and the prevailing atmosphere is one of neglect. The proximity of heavy traffic on the A5, and the local road gyratory system, greatly contributes to the creation of an unattractive and uncomfortable environment for pedestrians and cyclists. Public Access to Hendon Railway Station requires improvement and greater legibility. The opportunity will be taken to achieve a higher density of development throughout the regeneration scheme in a sustainable manner that will incorporate the highest standards of design.

2.22 *Policy C1(a) - West Hendon* represents the site specific allocation for West Hendon. This is replicated below with comments considering the current planning application in italics:-

#### **Policy C1(a) - West Hendon**

**“Within the Cricklewood, Brent Cross and West Hendon Regeneration Area, as defined on the Proposals Map, the Council may consider planning proposals for the West Hendon Area in advance of the remainder of the Regeneration Area. The mixed use regeneration of the area should comprise the following:**

- **High density housing, built to the highest design qualities, to replace existing stock and create a mix of housing in terms of size, affordability, those qualifying as Lifetime Homes and wheelchair accessibility; *the hybrid planning application increases development density on site, due to the requirement to re-provide 28,446m<sup>2</sup> of affordable housing on site whilst ensuring a step change in design quality of accessible housing through a wide range of 1, 2, 3 and 4 bed dwellings, of which 25% are affordable.***
- **A new local town centre to include a mix of retail, commercial, community and civic uses; *the policy does not specifically seek redevelopment of the existing local centre, rather to plan for enhancement of it to encourage and deliver economic sustainable development. The positive priority is a new local town centre, rather than redevelopment of the existing one. We consider that this objective will be met through cross spending derived from the new 2,000 homes which will generate £8.8M of retail expenditure which is far greater than that necessary to support the 1,766m<sup>2</sup> (gross uplift) 947m<sup>2</sup> (net uplift) in proposed retail & office floorspace (Use Class A1 – A5 & B1). In addition there will be qualitative improvements to retail and commercial floorspace within West Hendon Local Centre through the creation of a new civic area; public realm improvements in the vicinity of the development; returning vacant elements of the Broadway within the application site to active use; improved access for pedestrians and cyclists between the enhanced local centre, the new homes and the Welsh Harp;***

*improvements to the pedestrian route to and from Hendon Mainline Station; and the provision of retail choice to the local catchment. Community and civic uses will also be enhanced with proposals for 3,870m<sup>2</sup> of Class D1 Education and Community floorspace proposed comprising a 2FE Primary School and Nursery and a new community centre to form an important community hub. This development will deliver £500 million investment in the construction phases alone; 1,000 full-time construction jobs; 119 full-time jobs in new commercial and community provision; New Homes Bonus on new properties for a six-year additional revenue stream to the Council of £19.1 million; and Additional Council Tax revenue from new homes of £2 million per annum. There are real tangible benefits arising from the development which address development plan policies.*

- **Measures to protect and enhance the special interests of the Welsh Harp SSSI and integrated with the development and associated open space;** *The measures to protect and enhance the SSSI are extensively set out in the Ecological effect considerations of the Environmental Statement, fundamentally concluding that the development will provide real benefits to the SSSI through improved boundary security and landscape and operational management to ensure that the SSSI is retained for the purposes that it was originally identified for. The creation of a new masterplan also presents an opportunity to stitch the unique natural resource of the Welsh Harp back into the local neighbourhood. It is of critical importance that the new development re-engages with the Welsh Harp and allows the new community to once again enjoy the benefits that this natural asset can deliver. Indeed Natural England's remit is to ensure that everybody has the opportunity to use, understand, engage with and be inspired by the natural environment. Linking people with the natural environment has direct benefits to human health. Natural England have confirmed that growing evidence shows that access to the natural environment improves health and wellbeing, prevents disease and helps people recover from illness. Experiencing nature in the outdoors can help tackle obesity, coronary heart disease and mental health problems. We consider that the proposals successfully achieve this objective and the Design and Access Statement (DAS) Landscape Chapter explores further how the Welsh Harp spatial becomes integrated with the new open spaces across the site including York Park and The Green.*
- **Increased movement capacity on the A5 locally to assist the movement of buses through the area;** *the principal regenerative benefit of the development is to remove the Perryfield Way Gyratory system which causes both physical and environmental impediment to the spatial layout and structure of West Hendon Estate. This in turn results in a significant overhaul of the road infrastructure along the Broadway of which bus movements have been considered in detail within the Transport Assessment to ensure that bus movements are assisted through the area.*

- **Measures to improve transport links to, and facilities at, Hendon Railway Station.** *The DAS and Design Guidelines explain the new links across the site from the Welsh Harp up to and across the Broadway and along Station Road to the railway station. Where appropriate this development enhances existing pedestrian routes and widens pavements to ensure ease of access and an enhanced walking experience for new and existing commuters”.*

2.23 The key policy objective for West Hendon is addressed by this submission.

2.24 *Policy C2 - Urban Design - High Quality* confirms that the council will seek to achieve the highest standard of urban design in the Cricklewood, Brent Cross and West Hendon Regeneration Area in order to create a safe and attractive environment for people who live, work in and visit the area. These standards of design must result in development proposals of landmark quality. Proposals will need to be consistent with the strategic principles set down in the Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework.

2.25 Reference to the DAS, the Design Guidelines, Parameter Plans, Illustrative Drawings and Detailed Drawings we consider demonstrates a design intent for this site which will be controlled by the planning permission for future phases. The strategic design principles for the site have been endorsed by both the strategic and local planning authorities as providing a clear and coherent strategy upon which the detailed application is submitted, and future reserved matters will be based.

2.26 *Policy C3 - Urban Design – Amenity* confirms that development should protect and, where possible, improve the amenities of existing and new residents. As the West Hendon Estate will be demolished, the phasing of the development has been undertaken to ensure a viable decant strategy with minimal disruption for existing residents. There will unfortunately be some disruption but the long term benefits of the new development will outweigh this through the delivery of high quality new urban blocks which have good quality aspect, orientation, views, outlook and access to daylight and sunlight both in an outward direction and inward across the amenity courtyards.

2.27 *Policy C4 - Sustainable Design* is replicated below:

#### **Policy C4 - Sustainable Design**

**“The Council will seek to ensure that the redevelopment of the Regeneration Area pursues the highest standards of environmental design. Development should:**

- **Meet high performance standards for environmentally sustainable design and construction;**
- **Create an integrated network of open spaces and pedestrian and cycle routes to meet leisure, access, urban design and ecological needs both within the regeneration area and through enhanced connections to the surrounding; and**
- **Ensure the restoration and enhancement of the River Brent and its corridor in order to provide both amenity and nature conservation to the area; development which would be directly or indirectly detrimental to the nature conservation value of the Brent Reservoir Site of Special Scientific Interest will not be permitted.**

**Development proposals must also ensure that:**

- **There is an adequate buffer zone;**
- **Appropriate protection is afforded to legally protected species; and**
- **Opportunities are taken to enhance the biodiversity of the area.”**

2.28 Policy C4 Sustainable Design recognises the environmental assets within the regeneration area. Paragraph 12.3.11 notes that the Brent Reservoir was formed in 1835 by damming the River Brent and its unusually shallow depth and sloping banks have supported a particularly interesting habitat for breeding wetland birds, water fowl and a variety of plants. Any development will therefore be required to respect a buffer zone and protect this area of nature conservation interest. The policy justification does not define the extent of the buffer zone albeit does note that there must be no building within 8m of the brink of the River Brent (this is an Environment Agency requirement). Paragraph 12.3.12 confirms that development will only be acceptable in flood plains where the issue of flood risk has been addressed and both environmental and ecological mitigation has been agreed with the Environment Agency.

2.29 This policy contains a range of objectives which seek sustainable design across a range of carbon reduction, ecological, construction, and leisure based objectives. These matters are covered in detail with the design documents, energy statement and development specification. The

development is considered economically, socially and environmentally sustainable owing to its improvements fundamentally to the living conditions of existing and future residents through better quality homes, better sources of energy (Combined Heat and Power energy plan with Photovoltaic) and more efficient buildings (Code Level 4).

2.30 *Policy C5 - West Hendon and Cricklewood Town Centres* is replicated below:

**Policy C5 - West Hendon and Cricklewood Town Centres**

**“The Council will seek to maintain and enhance the vitality and viability of the West Hendon and Cricklewood town centres. Proposals for the redevelopment of new retail and other key town centre uses will be considered in accordance with policies TCR1, TCR5 and TCR7”.**

2.31 As considered within the analysis of Policy C1(a), and the Retail Impact Assessment, it is considered that the vitality and viability of West Hendon local centre will be maintained and enhanced by this development. Demolition of the centre and rebuild is not considered a sustainable approach for West Hendon, rather an organic regeneration delivered through increased residential expenditure availability, greater permeability and routes, enhanced public realm and fundamentally a re-connection in both visual and physical terms to the Welsh Harp will deliver this objective.

2.32 *Policy C6 - Brent Cross New Town Centre* does not relate to West Hendon nor does *Policy C7 - Transport Improvements*.

2.33 *Policy C8 - Parking Standards* does relate to Cricklewood, Brent Cross and West Hendon Regeneration Area and confirms that the following “maximum” standards will apply.

**Policy C8 - Parking Standards**

**“The Council will apply the following maximum car parking standards to development in the Cricklewood, Brent Cross and West Hendon Regeneration Area:**

- i) Housing - 1 space per unit;**
- ii) Business (Use Classes B1 or B2) - 1 space per 300m<sup>2</sup>;**
- iii) Retail, leisure facilities and hotels with the new town centre, as defined on the Proposals Map - no further car parking;**
- iv) Other retail locations in the Cricklewood and West Hendon town centres - as set out within the London Plan;**



- v) **Hotels outside the town centre - 1 space per 2 bedrooms, plus 1 space per 5 seats for conference facilities;**
- vi) **The existing and new Cricklewood Railway Stations - parking only for disabled passengers and staff for pick up and set down purposes.**

**Parking Standards for developments outside the uses set out above will follow the Guidance set out in the London Plan”.**

- 2.34 In light of the commentary set out within Section 1.4 of the Core Strategy and Section 1.4 of the DPM DPD it is apparent that this policy would take precedence over any other parking standard set out by Barnet, and in particular DM17 Travel Impact and Parking Standards. The supporting text of DM17 confirms this “Parking standards for Brent Cross – Cricklewood will be treated differently from those set out in Policy DM17 (see saved suite of policies on Brent Cross – Cricklewood in the Core Strategy). The supporting Transport Assessment seeks to address these standards and those in the Barnet DPD to achieve an acceptable balance between meeting future needs and reducing vehicular travel. The development proposes car parking provision of 80% for the residential component which sits with this maximum. 10% will be for wheelchair users. There will also be 65 commercial spaces to support the commercial uses along the Broadway.
- 2.35 *Policy C9 – Housing and Community Development* deal with housing and community development within the Cricklewood and Brent Cross Areas only. Paragraph 12.3.31 notes that the 5,000 figure does not include proposals for West Hendon “where an additional 2,200 homes (1,600 net) are being advanced separately”.
- 2.36 *Policy C10 – Employment* deals only with the Brent Cross “rail-related employment land and mixed use land” areas only.
- 2.37 *Policy C11 – Implementation* states that the council will require developers to provide for on-site and off-site infrastructure, facilities and services necessary to support the regeneration of the area and its integration with the surrounding area. This is noted by the applicant and discussions remain ongoing in respect of Mayoral CIL charges and s.106 contributions necessary to offset the relevant impacts arising from the development.

**d) Schedule of Proposals**

- 2.38 Within Chapter 13, Implementation, Section 13.4 Schedule of Proposals identifies smaller sites for redevelopment. Site 213-227 West Hendon Broadway (Site Ref. 33) is proposed for mixed-use including retail and office. The site is identified as being part vacant, garage and health clinic. Site 1-4 West Hendon Broadway is proposed for employment uses (Site Ref. 34). The Welsh Harp Nature Reserve is proposed as a Site of Special Scientific Interest and a Local Nature Reserve (Site Ref. 35).
- 2.39 It will need to be confirmed by Barnet officers as to whether this component of the Barnet UDP remains development plan policy, however any site specific policy will need to be read in conjunction with the wider regeneration policies for West Hendon.

### 3 BARNET CORE STRATEGY 2012

- 3.1 The Barnet Core Strategy and Development Management Policies (DMP) DPD were adopted in September 2012 and represent development plan policy. Its implications for West Hendon are discussed below.
- 3.2 The Core Strategy DPD forms part of the Barnet LDF which will replace the Saved UDP Policies in due course. The Site Allocations DPD and Development Management Policies DPD will in turn comprise the LDF.
- 3.3 The Core Strategy contains 15 policies which supersede a number of UDP policies and Appendix C of the Core Strategy identifies which policies are replaced.
- 3.4 Policy CS NPPF – National Planning Policy framework – Presumption in Favour of Sustainable Development confirms that Barnet will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). Barnet will always work proactively with applicants jointly to find solutions to secure development that improves the economic, social and environmental conditions in Barnet. Planning applications that accord with policies in Barnet’s Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. This is positive.
- 3.5 As previously discussed Section 1.4 of the Core Strategy confirms that the policies relating to Brent Cross - Cricklewood (which includes West Hendon despite the name change) will continue to operate until it is considered appropriate to replace. The relevant policies are set out in section 2 of this report. It is important to set out however, that Chapter 7 - Barnet’s Place Shaping Strategy and Policy CS2 adds a new dimension to the policy approach. It confirms a new policy area called Brent Cross – Cricklewood which seeks to pick up on the London Plan Opportunity Area allocation. Its boundaries are defined as Map 5 of the Core Strategy and it excludes West Hendon. This does not exclude West Hendon from the saved UDP policies, rather creates a new policy allocation for Brent Cross.

3.6 Paragraph 7.2.12 of Chapter 7 confirms that it is a major priority to regenerate failed housing estates in Barnet. The five major estates are identified on the Key Diagram Map No. 2. These estates will be subject to long-term programmes of regeneration in order to tackle poor quality housing, social isolation and transform these areas into successful mixed tenure places.

3.7 The paragraph goes on to confirm that:

#### **West Hendon**

**“Located between the A5 and the Welsh Harp Reservoir, the West Hendon Estate is another product of the 1960s. The existing 680 homes will be replaced by a new mixed tenure neighbourhood of up to 2,200 new homes, a net increase of 1,500 homes. In addition approximately 10,000m<sup>2</sup> of non-residential floorspace will be built to help create a focal point around a new town square. This programme is underway. It is estimated that the scheme will be completed before 2026. The redevelopment of West Hendon is being taken forward in parallel, but independently of the regeneration of Brent Cross - Cricklewood”.**

3.8 This paragraph references the part implemented outline planning permission W139874/04, dated 1st July 2008. This will naturally be updated by this current planning application which proposes 2,000 (net c.1,403 new residential units) and 5,636sqm of non-residential floorspace. It is noted that the current application does exclude the 186 units already built out as part of Phase 1 and 2 of permission W139874/04 and retains the 34 existing units within Ramsey Close which were previously part of the development. There are also c.35 units along the Broadway to be demolished. On a like for like basis this would result in a total provision of 2,221 units (net c. 1588 units) which remains broadly in line with the policy intent.

3.9 Policy CS1 – Barnet’s Place Shaping Strategy – Protection, Enhancement and Consolidated Growth – The Three Strands Approach is the principal housing and growth policy for Barnet. The policy confirms that the council will focus major housing and economic growth in the most suitable locations and manage it to ensure that we deliver sustainable development, while continuing to conserve and enhance the distinctiveness of Barnet as a place to live work and visit. An appropriate level of transport provision will be provided as the regeneration schemes roll out. Barnet will seek the highest standards of urban design in order to generate development proposals of landmark quality and create an accessible safe and attractive environment for people who live in, work in or

visit Barnet's areas of housing and economic growth. This policy reflects the objectives of saved UDP policies in Chapter 12 as discussed in the previous section of this addendum.

- 3.10 The policy then cross references other Core Strategy policies.
- 3.11 Chapter 8 deals with the distribution of housing growth in the borough, and includes Policy CS3 - Distribution of Growth in Meeting Housing Aspirations. It confirms that on the basis of the Three Strands Approach, Barnet expect c.28,000 new homes to be provided within the lifetime of the Core Strategy 2011/2012 to 2025/2026. In order to meet the Decent Homes Standard and deliver a greater range and variety of accommodation, Policy CS3 confirms that the borough will promote the regeneration of priority housing estates, to include the five main estates in the Borough (including West Hendon). This development is expected to provide in the range of 2,200 new homes between 2011-2026. The policy then goes on to suggest phasing of this delivery as net additions. As detailed above this planning application will meet this objective and deliver a significant quantum of homes.
- 3.12 Policy CS3 concludes that a programme of town centre strategies will develop frameworks for the town centres of Chipping Barnet, Edgware, Finchley, Church End and North Finchley (West Hendon is not referenced). It also notes that the strategic approach for further development will be set within the context of the density matrix in the existing London Plan.
- 3.13 Chapter 9 sets out the Council's approach to Providing quality homes and housing choice in Barnet.
- 3.14 Policy CS 4 - Providing quality homes and housing choice in Barnet confirms that the Borough will undertake the following actions. We comment on each of these below (in italics):-
- Seek to ensure a mix of housing products in the affordable and market sectors to provide choice for all households and enable Barnet residents to progress on a housing journey that can meet the aspirations of home ownership. *The development promotes a strategic range of housing choice and mix as set out in the Development Specification which has been informed by housing needs and market demand.*
  - Seek to ensure that all new homes are built to Lifetime Homes Standards and that through extending the inclusive design principles embedded in Lifetime Homes we can create Lifetime

Neighbourhoods that are welcoming, accessible, and inviting for everyone, regardless of age, or health, or disability. *The development is 100% lifetime home compliant.*

- Seek a range of dwelling sizes and types of housing including family and lifetime homes that meets our identified housing priorities and does not undermine suburban character or local distinctiveness. Policy CS 5 on Protecting and Enhancing Barnet’s Character to Create High Quality Places sets out how we will secure high quality design. *Table 4.4 Strategic Housing Mix of the Development Specification meets this objective and is supported by the GLA.*
- Seek a variety of housing related support options that maximise the independence of vulnerable residents including young people, people with disabilities, older people, homeless people and other vulnerable adults. *There is no supported living as part of this development proposal, albeit the management procedures of Metropolitan Housing will by default ensure support for necessary vulnerable groups where necessary in the social rented sector.*
- Delivering a minimum affordable housing target of 5,500 new affordable homes by 2025/26 and seeking a borough wide target of 40% affordable homes on sites capable of accommodating ten or more dwellings. *This development delivers 25% affordable housing provision which is the maximum that it can financially deliver. This equates to c. 507 affordable units for the borough which comprises 10% the borough’s requirements up to 2025. Barnet Council will have 100% nomination rights in perpetuity for the affordable rent units.*
- Seek an appropriate mix of affordable housing of 60% social rented and 40% intermediate for Barnet that will support our objectives of widening home ownership and providing family homes. *The application proposes by unit a provision of 57% affordable intermediate homes and 43% social rented to reflect the decant and viability requirements of the development which is justified through the viability appraisal.*
- On sites which are suitable for the provision of an element of affordable housing, we may exceptionally accept the provision of off-site housing, or a commuted payment instead of such provision. *All affordable housing is accommodated on site.*

- In seeking to maintain the housing supply Barnet will adjust the type and mix of housing sought, having regard to the financial viability of development, the housing market and the needs of different groups. *This application is subject to an independent viability assessment in support of the quantum and tenure of affordable housing proposed.*

3.15 Chapter 10 - Protecting and Enhancing Barnet’s Character to Create High Quality Spaces represents the principal chapter on the provision of high quality design. Policy CS5 – Protecting and enhancing Barnet’s character to create high quality places confirms that Barnet will ensure that development respects local context and distinctive local character creating places and buildings of high quality design and these are commented on below:-

- Address the principles, aims and objectives set out in the following national design guidance By Design, Secured by Design, Safer Places, Inclusive Design, Lifetime Homes and Building for Life. *This has been achieved through discussions with the Secure by Design advisors for this part of LB Barnet with particular discussion regarding the security and safety of play areas and the pedestrian bridges.*
- Be safe, attractive and fully accessible. *The application design has also been audited by access amenity groups organised through the GLA with recommendations considered and included in commentary within the DAS.*
- Provide vibrant, attractive and accessible public spaces. *See DAS and Design Guidelines.*
- Respect and enhance the distinctive natural landscapes of Barnet. *See DAS and Design Guidelines.*
- Protect and enhance the gardens of residential properties. *n/a*
- Protect important local views from places within Barnet (as set out in Map 8). *A visual impact assessment of the development has been undertaken as part of the Environmental Statement with particular regard to the environmental effects of the tall building proposed for the site. Whilst changes to key receptors will take place it is not considered this will have adverse environmental impacts, and indeed the peer review Townscape Assessment produced by Peter Stewart confirms no detrimental impact and protection of views confirming that the*

*visual effect of the building elements of different heights, combined with the varied street line referred to above, is a pleasingly picturesque composition, with changing views as one walks around the Proposed Development, and in views towards the new housing from outside the Site. The tall buildings are integrated into the overall composition of forms.*

- Enhance the borough's high quality suburbs and historic areas through the provision of buildings of the highest quality that are sustainable and adaptable. *See DAS and Design Guidelines.*

3.16 Policy CS5 also establishes the requirements to address 'Heritage and Character' issues and 'Tall Buildings' stating that:-

**"Tall buildings (8 storeys or 26 metres or more) may only be considered in the following strategic locations: ...West Hendon Estate...Proposals for Tall Buildings will be considered in accordance with DM05 – Tall Buildings, London Plan Policy 7.7 – Location and Design of Tall and Large Buildings and Guidance on Tall Buildings (2007) by English Heritage and CABE".**

3.17 Paragraph 10.6.6 refers specifically to West Hendon, noting that the scheme will create a new focal point for the area around the town's square which will be linked to the Welsh Harp and surrounding green space by landscaped green corridors. Tall buildings ranging from 8 to 20 storeys will mark out these green corridors. The paragraph refers to the part implemented planning permission approved in July 2008 (planning application W13937/04) albeit the principles of tall building development remains at this site, albeit with a difference emphasis of height towards the Welsh Harp and away from the Broadway to enhance the quantum of new residential homes that can benefit from this natural asset.

3.18 Chapter 11 - Vibrant Suburban Town Centres confirms at paragraph 11.35 and Map 9) that West Hendon is one of five local centres in the borough. It is noted that West Hendon appears the most dilapidated, deprived and in need of enhancement. Paragraph 11.4.2 confirms that the 2010 Borough Retail Update concludes that there is residual global capacity to support 2,200m<sup>2</sup> net additional convenience goods provision over and above existing commitments in planning consents, and pipeline developments. The later part of this statement is important as the update has taken into consideration planning application W13937/04 (July 2008) which permits up to 1,500m<sup>2</sup> of Class A1 Retail floorspace.



- 3.19 With regards to comparison goods capacity paragraph 11.5.2 identifies a requirement to support 16,800m<sup>2</sup> net provision over and above existing commitments and pipeline developments. With this level of residual capacity for comparison goods Barnet consider it appropriate to plan for modest comparison goods development including extensions to stores in town centres. The Retail Impact Assessment (Document 4.5) submitted with this application confirms that there is sufficient retail capacity alone to support the net increase (947sqm) of floorspace proposed should it all be used for Class A1 purposes.
- 3.20 Policy CS6 – Promoting Barnet’s town centres confirms the intention to meet the identified need in the plan period and promote successful and vibrant centres within Barnet. This policy is addressed by this application.
- 3.21 Chapter 12 of the Core Strategy deals with Enhancing and protecting Barnet’s open spaces. The chapter raises the importance of public open space accessibility; Barnet’s parks; and children’s play facilities.
- 3.22 Paragraph 12.6.2 notes that the borough contains one Site of Special Scientific Interest – the Welsh Harp Reservoir - into which the River Brent and Silk Stream flow. Access to Welsh Harp will be improved as part of the regeneration proposals for West Hendon. A footpath including two new footbridges will be created around the Reservoir. The Reservoir together with the River Brent, Silk Stream and Pymmes Brook form part of the Blue Ribbon Network.
- 3.23 Policy CS7 - Enhancing and Protecting Barnet’s Open Spaces seeks to create a greener Barnet by protecting open spaces, including Green Belt and Metropolitan Open Land and enhancing the spaces through positive management to provide improvements in overall quality and accessibility.
- 3.24 The DAS Landscape chapter discusses in detail the overarching approach to the provision of open space within the development and should be read alongside the Design Guidelines which demonstrate the protection of strategic green gateways through the site.
- 3.25 Chapter 13 Promoting a strong and prosperous Barnet, through Policy CS8 - Promoting a Strong and Prosperous Barnet seeks to deliver economic outputs for the borough. Notably new job creation is centred at Colindale and Mill Hill East delivering 1,500 new jobs and 20,000 new jobs in Brent Cross Cricklewood. There is no specific mention of West Hendon, albeit with this development delivering

£500 million investment in the construction phases alone 1,000 full-time construction jobs and 119 full-time jobs within the new commercial and community floorspace it is felt that that this development will contribute real and tangible benefits to support the strategic objectives of the plan.

- 3.26 Chapter 14 Providing safe, effective and efficient travel, through Policy CS9 Providing safe, effective and efficient travel confirms that the borough will promote the delivery of appropriate transport infrastructure in order to support growth, relieve pressure on Barnet’s transport network, and reduce the impact of travel whilst maintaining freedom and ability to move at will. The borough will continue to manage a parking regime which recognises that many Barnet residents will continue to own and travel by car and as already has been discussed significant highway improvements will arise from the removal of the Perryfield’s Way gyratory system.
- 3.27 Chapter 15 Enabling inclusive and integrated community facilities and uses through Policy CS10 Enabling inclusive and integrated community facilities and uses sets out the boroughs approach to community infrastructure. Community infrastructure is enhanced on site through the delivery of 3,870sqm of Class D1 floorspace (2FE Primary School and Nursery and Community Centre floorspace) which will more than offset the demolition existing facilities as detailed below.

Existing / Proposed	Useable Community Floorspace	Site
Existing	149 sq m (GEA)	West Hendon Community Centre
Existing	478 sq m (GEA)	The Marquin Centre
Existing	134 sq m (GEA)	189 Broadway
Sub-Total	761 sq m (GEA)	
Proposed	304 sq m (GEA)	Ground Floor Block G5
Proposed	500 sq m (GEA)	Community Centre (adjacent to Primary School)
Proposed	3,066 sqm (GEA)	New 2FE Primary School
Sub-Total	3,870 sqm (GEA)	

- 3.28 Paragraph 15.7.3 states that Barnet is experiencing unprecedented pressure on primary school places, which is projected to increase in the coming years as existing pupils progress through primary school and the number of births in the borough continues to rise. Significant capital investment is required in additional school places, with a permanent expansion proposed at Broadfields Primary School, and plans being developed to increase capacity in the Colindale area. Permanent expansions for future years are also proposed in the Finchley and East Barnet areas.
- 3.29 Policy CS10 therefore confirms that the council will (inter alia):-
- ensure that our programmes for capital investment in schools and services for young people address the needs of a growing, more diverse and increasingly younger population
  - promote the role of schools as ‘community hubs’, providing a wide range of educational, advice, leisure and support services to children, families and the wider community
  - support the enhancement and inclusive design of community facilities ensuring their efficient use, and the provision of multi-purpose community hubs that can provide a range of services to the community at a single accessible location
- 3.30 It is considered that this development will meet these key strategic policies.
- 3.31 Chapter 16 and Policy CS11 – Improving health and wellbeing in Barnet; Chapter 17 and Policy CS12 Making Barnet a safer place set out policies to improve health within the borough and tackle crime and fear, ensuring that appropriate security and community safety measures are delivered in buildings and that design principles which contribute to community safety and security are incorporated into all new developments.
- 3.32 As previously detailed Natural England have evidential data that confirms that the natural environment offers many benefits for health and wellbeing. It reduces stress levels; encourages people to be more active, and avoids people getting ill. People also live longer if they live near areas of green space.
- 3.33 Natural England want more people to get out into the natural environment to have fun and get active. Being active outdoors makes people feel good, helps them to live longer and connects them

to their local area. Natural England want to strengthen the connections between people and the natural environment, wherever they live, and this is an objective that this development seeks to achieve both in terms of physical access, but also in terms of visual access.

- 3.34 Currently, the Welsh Harp is hidden from view and has a poorly managed boundary leading to unauthorised access to the SSSI. One can stand on the Broadway, or indeed within the majority of the existing Estate, and not know that the Welsh Harp exists.
- 3.35 The new West Hendon will see a more clearly defined pedestrian route run from Hendon Station, through the development to the edge of the Welsh Harp, allowing it to be seen from The Broadway for the first time since the current estate was built. By providing this new public park from the Broadway to the Welsh Harp, and then along the banks of the Welsh Harp, a new natural asset will be created to the benefit of the local community.
- 3.36 Chapter 18 Ensuring the efficient use of natural resources sets out the Council's approach to climate change. Policy CS13 – Ensuring the efficient use of natural resources seeks to promote highest environmental standards for development and through Barnet's SPDs on Sustainable Design and Construction and Green Infrastructure. In line with London Plan Policy 5.2 – Minimising Carbon Dioxide Emissions Barnet will expect major development in accordance with the Mayor's energy hierarchy to reduce carbon dioxide emissions beyond the 2010 Building Regulations. The borough will also be a water efficient borough minimising the potential for fluvial and surface flooding by ensuring development does not cause harm to the water environment, water quality and drainage systems. Development should utilise Sustainable Urban Drainage Systems (SUDS) in order to reduce surface water run-off and ensure such run-off is managed as close to its source as possible subject to local geology and ground water levels. Air and noise quality will also be improved by requiring Air Quality Assessments and Noise Impact Assessments from development in line with Barnet's SPD on Sustainable Design and Construction. The Environmental Statement provides commentary on the effects on this development on natural resources.

## 4 BARNET DEVELOPMENT MANAGEMENT POLICIES 2012

- 4.1 The Barnet Development Management Policies (DMP) DPD were adopted in September 2012 and represent development plan policy. Their implications for West Hendon are discussed below.
- 4.2 The Development Management Policies Document sits beneath the Core Strategy in the hierarchy of the LDF. There is no site specific allocations within this document other than the identification of West Hendon as a local centre and the recognition within Appendix 4, Local Frontages along West Hendon Broadway.
- 4.3 The Development Management Policies (DMP) contain 18 key policies covering all aspects of development control/management. These policies provide additional guidance on the Core Strategy documents, fundamentally there should be nothing within this document that contradicts the Core Strategy.
- 4.4 The policies need to be read against Section 1.4 of the Core Strategy and DPM which explains that the Development Management policies will not apply to the development of the Brent Cross Cricklewood Regeneration Scheme unless and until the Core Strategy or the DPD is reviewed.
- 4.5 On the face of it therefore, the DMP policies are of no relevance to the West Hendon application. In practice this is unlikely to be totally accurate, as there will need to be an overlap of policy detail, albeit the DPD's are clear on the issue. Notwithstanding this a brief review is set out below.
- 4.6 Policy DM01: Protecting Barnet's character amenity seeks to ensure (inter alia) a quality of hard and soft landscaping and a retention of the Borough's character. As the DAS, Design Guidelines and application drawings show this approach will be maintained by this submission.
- 4.7 Policy DM02: Development standards confirms that development will be expected to comply with By Design, the CABE urban design principles; Lifetime Homes; Code for Sustainable Homes; BREEAM; wheelchair accessibility (LP Policy 3.8); minimum floorspace (LP Policy 3.5); outdoor garden amenity space (Sustainable Design and Construction SPD); Secured by Design; and play space (LP Policy 3.6).

- 4.8 The development will achieve the minimum unit size requirements established by the London Plan as set out in the detailed and illustrative accommodation schedules. Secure By Design principles, as detailed above, will also be met in liaison with the Metropolitan Police Advisory team.
- 4.9 With regards to amenity space, the April SPD notes that higher density development, such as flats may not always be able to provide amenity space to the standards outlined in Table 2.3. Where the standards cannot be met innovative design solutions should be considered. This is a predominant apartment led development, and with a standard of 5sqm per habitable room, and an estimated 5,976 habitable rooms, then 29,880sqm of amenity space will be required.
- 4.10 Policy DM03: Accessibility and inclusive design states that proposals should meet the highest standards of accessible and inclusive design. This has previously been discussed.
- 4.11 Policy DMO4: Environmental Considerations seeks to address energy requirements; air pollution; noise levels; contamination; and water hierarchy strategy including flooding and run off. This has previously been discussed.
- 4.12 Policy DMO5: Tall Buildings discussed the Council's approach to tall buildings. West Hendon is strategic location where Tall Buildings are deemed acceptable in principle and the justification for delivery of such buildings is set out in the DAS and Townscape Appraisal. The approach to the future design of the tall buildings at reserved matters is provided in the Design Guidelines and the environmental effects of the proposed scale of development are assessed in the Environmental Statement.
- 4.13 Further comment on the policy is set out below:-

**DM05: Tall Buildings**

**“Tall buildings outside the strategic locations identified in the Core Strategy will not be considered acceptable. Proposals for tall buildings will need to demonstrate:**

**i. an active street frontage where appropriate** *the detailed application drawings for Building E2 provide detail on the ground floor solution which, given the levels across the site, provide for different elevations to different orientations. The elevations for E2 and the other tall buildings within the development will be activated not by different land uses by elevational activity and natural surveillance as detailed in the Design Guidelines.*

**ii. successful integration into the existing urban fabric** *The DAS and Townscape Appraisal do recognise that these tall buildings will be visual markers for this site because of their scale albeit importantly it is concluded that the tall buildings are integrated into the overall composition of forms. The proposed towers are integrated into the scheme as a whole rather than presented as detached, isolated objects. They share a common architectural language with the midrise housing, and their form is related to the form of the courtyard blocks.*

**iii. a regard to topography and no adverse impact on Local Viewing Corridors, local views and the skyline** *regard has been had to the topography as a matter of good urban design evaluation and optioning. The Proposed Development will have a distinct **character** and identity. In part this will be the result of taking advantage of the opportunities afforded by the Site; the combination of the slope down to the west, and the presence of the reservoir, will make Broadway Place a memorable heart of the scheme; and the view of the towers across the water and the green landscape of York Park will also have a strong character. As well as these particular, site specific aspects, the architectural approach and the public realm design achieve a strong and distinct identity. The ES considers the effects on the viewing corridors and skyline, with impacts broadly divided into those from urban areas and those from open green space. The views from urban areas, such as The Broadway, The Hyde and the A406, are expected to be improved as the new buildings act as landmarks for the proposed town centre and add interest against the urban backdrop. However, there are negative impacts expected on views from Brent Reservoir and West Hendon Playing Fields when considered in the context of open skyline, not due to an assumption that the buildings themselves would be unattractive. From a townscape (as provided by Peter Stewart Consultancy), as opposed to a landscape perspective, the tall buildings provide a strong sense of identity to the development, marking the presence in the wider townscape of an area that today has no presence at all.*

**iv. not cause harm to heritage assets and their setting** *An assessment of cultural heritage has been undertaken using a range of available resources to establish the known archaeological and built heritage baseline of the application site. **In terms of built heritage, the proposed development will not have any major adverse effects on designated structures, either physically or to their settings***

**v. that the potential microclimatic effect does not adversely affect existing levels of comfort in the public realm** *A wind impact assessment for the proposed development has been carried out using both a qualitative desktop study and a quantitative analysis using Computational Fluid Dynamics (a mathematical model). A range of different wind conditions were considered and the effect of the development on local wind speeds, winds off-site and pedestrian comfort was assessed. This analysis identified that the proposed development has a marginal impact on wind conditions off-site. The predicted maximum wind speeds on-site are consistent with the proposed usage and as such significant additional mitigations are not recommended.*

**Proposals for redevelopment or refurbishment of existing tall buildings will be required to make a positive contribution to the townscape”.**

- 4.14 Policy DMO6: Barnet’s Heritage and Conservation confirms all heritage sets will be protected in line with their significance. As detailed above this assessment has been carried out in the ES and no adverse effects found.
- 4.15 Policy DMO7: Protecting Housing in Barnet confirms that the loss of residential accommodation will not be granted unless (Part (e)) it involves identified regeneration areas with large scale demolition of housing and estates which provide for the net replacement of the total residential ‘units’. It is noted that this policy refers to net replacement residential units, rather than floorspace. As the development delivers just under 4 times the current number of units on site this policy is met. The net replacement of 28,446sqm of affordable housing floorspace is also achieved and exceed by this application meeting estate regeneration requirements. 36,846sqm of net affordable floorspace is proposed.
- 4.16 Policy DMO8: Ensuring a Variety of Sizes of New Homes to Meet Housing Need sets out a priority list for new dwellings within the borough. Paragraph 9.1.16 confirms that this mix “can be applied flexibly” and “it may not be appropriate to meet the dwelling size priorities in the town centres and local centres”. Further, paragraph 9.17 confirms that for intermediate affordable housing

**“..whilst the aspiration is for family sized homes the practical and financial reality is that for products such as shared ownership/low cost home ownership the size of housing may be unaffordable. Therefore smaller one and two bedroom intermediate homes will also be supported”.**

- 4.17 Policy DM08 is set out below:

**Policy DMO08 - Ensuring a Variety of Sizes of New Homes To Meet Housing Needs**

**“Development should provide where appropriate a mix of dwelling sizes and sizes in order to provide choice for a growing and diverse population for all households in the borough.**

**Our dwelling size priorities are:**

- i) For social rented housing - homes with 3 bedrooms are the highest priority;**



- ii) **For intermediate affordable housings - homes with 3-4 bedrooms are the highest priority;**
- iii) **For market housing - homes with 4 bedrooms are the highest priority, homes with three-bedrooms are a medium priority”.**

- 4.18 The West Hendon Estate is not a mixed and balanced community and therefore fails to meet the requirement of national policy to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.
- 4.19 The Estate is heavily biased towards affordable housing units (76%) of which 42% are 1 bed flats and 57% are 2 bed maisonettes. There is little by way of a variety of unit mix, or indeed affordable unit tenure in the intermediate affordable housing group.
- 4.20 The application proposals will deliver a rebalancing of residential tenures across the site by introducing private housing (75% by unit number) and a new range of intermediate tenancies within the affordable range.
- 4.21 At present the illustrative masterplan provides an indication of how the housing mix might come forward. The strategic social rent mix is based on the known housing needs of the existing secure tenants on the estate. The intermediate mix is based on an assumed mix that will be market tested prior to each reserved matters planning application and will relate to the funding product that is available from the GLA at the time each phase is delivered.
- 4.22 This has been refined further within Table 4.4 of the Development Specification document which seeks to establish a Strategic Housing Mix for the site.
- 4.23 When taking into account the decant requirement of this development, and in particular those of the Barnet secure tenancies, the proposed strategic mix is considered to meet the strategic aspirations of Core Strategy Policy CS4 and DPD Policy DM08 and the financial and housing requirements bespoke to this estate renewal. In terms of social rent, the proposals will increase provision of 3-bed units from 0.33% (2 units) across the site to an illustrative 34 units comprising flats, duplexes and houses. With regards intermediate housing, whilst a maximum range of up to 30% intermediate three-bed provision is proposed, the reality of meeting affordability criteria

means that a large number of 3-beds is unrealistic. This is also true for 4-bed intermediate accommodation.

4.24 This mix is supported by the GLA.

4.25 Policy DM10 Affordable Housing confirms the following requirement which is “subject to viability”:-

**“Having regard to the borough-wide target that 40% of housing provision should be affordable, the maximum reasonable amount of affordable housing will be required on site, subject to viability, from all new sites providing 10 or more units gross or covering an area of 0.4 hectares or more”.**

4.26 The objectives of this policy have been discussed previously in this document.

4.27 Policy DM11 Development principles in the town centres requires a suitable mix of uses as part of development with the town centres to support their continued vitality and viability. West Hendon does not appear within the chapter as a defined ‘town centre’, rather is considered a local centre.

4.28 Policy DM12 Maintaining local centres and parades is relevant to West Hendon. It confirms that:-

**“The council will protect all retail uses (Class A1) in the existing local centres, parades and isolated shops unless it can be demonstrated that:**

- i. there will be no significant reduction of shopping facilities as a result; and**
- ii. that alternative shopping facilities that are similarly accessible by walking, cycling or public transport exist to meet the needs of the area; and**
- iii. the proposed use is within Class A2, A3, A4, A5 or meets an identified local need; and**
- iv. there is no demand for continued Class A1 use, and that the site has been marketed effectively for such use.**

**A proposal that either creates an over concentration of Class A2, A3, A4 and A5 uses or has a significant adverse effect on the amenity of existing residents will be refused. Community uses will be expected to present an active frontage at ground floor and be able to demonstrate a similar weekday footfall to a Class A1 use. Proposals for residential use should not cause a break in a frontage”.**

4.29 The objectives of this policy have been discussed previously in this document.

4.30 Policy DM13: Community and education uses confirms the following:-

#### **Loss of Community / Educational use**

**“Loss of community / educational use will only be acceptable in exceptional circumstances where:**

**i. New community or education use of at least equivalent quality or quantity are provided on the site or at a suitable alternative location; or**

**ii. There is no demand for continued community or education use, and that the site has been marketed effectively for such use.**

**b: New community or educational use**

**New community or educational uses should be located where they are accessible by public transport, walking and cycling, preferably in town centres or local centres.**

**New community or educational uses should ensure that there is no significant impact on the free flow of traffic and road safety. New community or educational uses will be expected to protect the amenity of residential properties”.**

- 4.31 The objectives of this policy have been discussed previously in this document.
- 4.32 Policy DM14: New and existing employment space seeks to retain employment floorspace unless it can be demonstrated that it is no longer suitable or viable. New employment floorspace is expected to be located in a sequentially preferably manner. The objectives of this policy have been discussed previously in this document.
- 4.33 Policy DM15 Green Belt and Open Space confirms that except in very special circumstances the Council will refuse any development in the Green Belt or MOL which is not compatible with their purposes and objectives or does not maintain their openness. Development adjacent to the Green Belt/MOL should not have a detrimental impact on the visual amenity and respect the character of its surroundings. Open space will be protected from development. In exceptional circumstances loss of open space will be permitted where equivalent or better quality open space provision can be made.
- 4.34 The only allocations that may be effected by this development relate to the areas of MOL which may be passed through / alongside by virtue of the two pedestrian bridges. This considered acceptable subject to detailed design as they facilitate greater access to open space for future residents and therefore there are strategic benefits.

- 4.35 Policy DM16: Biodiversity seeks the retention and enhancement, or the creation of biodiversity. Where development will affect a Site of Importance for Nature Conservation and / or species of importance the council will expect the proposal to meet the requirements of London Plan Policy 7.19E. The objectives of this policy have been discussed previously in this document.

## 5 THE LONDON PLAN, SPATIAL DEVELOPMENT STRATEGY FOR GREATER LONDON, JULY 2011

5.1 The London Plan, Spatial Development Strategy for Greater London, adopted July 2011, comprises the Development Plan for the purposes of Section 38(6). It represents the strategic planning policies for London. Boroughs local development documents have to be in general conformity with the London Plan. As such, any development plan policies set out with the London Borough of Barnet Saved UDP need to be read alongside policies within the London Plan.

a) **London Plan Allocation**

5.2 West Hendon is not identified for any specific allocation within the London Plan. Cricklewood/Brent Cross which is identified as Opportunity Area No. 5.

b) **Housing**

5.3 Policy 3.14 Existing Housing represents the principal development plan policy of the London Plan relevant to proposed Estate Regeneration. It confirms under Planning Decisions and LDF Preparation the following:

**Policy 3.14 - Existing Housing**

**“b) Loss of housing, including affordable housing, should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace”.**

5.4 Justifying text paragraph 3.82 confirms that:

**“Estate renewal should take into account the regeneration benefits to the Local Community, the proportion of affordable housing in the surrounding area (see Policy 3.19), and the amount of affordable housing intended to be reprovided elsewhere in the Borough. Where redevelopment of affordable housing is proposed, it should not be permitted unless it is replaced by better quality accommodation, providing at least an equivalent floorspace of affordable housing”.**

- 5.5 Policy 3.14 therefore sets the benchmark upon which any estate regeneration proposal must conform. Fundamentally, existing affordable accommodation within the estate must be reprovided with at least equivalent net floorspace. The objectives of this policy have been discussed previously in this document.
- 5.6 Policy 3.3 - Increasing Housing Supply, confirms that the Mayor recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford. The Mayor will therefore seek to ensure at least an annual average of 32,210 net additional homes across London. The objectives of this policy have been discussed previously in this document.
- 5.7 Policy 3.3 (Part D) confirms that boroughs should seek to achieve and exceed the relevant “minimum” borough Annual Average Housing Target in Table 3.1. Table 3.1 identifies the London Borough of Barnet for a minimum 10 year target of 22,550 homes on an Annual Monitoring Target of 2,255 homes. The objectives of this policy have been discussed previously in this document.
- 5.8 Policy 3.4 - Optimising Housing Potential, confirms that developments should optimise housing output for different types of location within the relevant density range shown in Table 3.2, taking into account local context and character, the design principles promoted by the London Plan and public transport capacity. Development proposals which compromise the policy should be resisted.
- 5.9 Policy 3.5 - Quality and Design of Housing Developments, establishes minimum space standards for LDFs which should conform with Table 3.3. The Mayor will, and boroughs should, seek to ensure that new development reflects these standards albeit Part (C) does confirm that development proposals which compromise the delivery of elements of this policy may be permitted if they are demonstrably of exemplary design and contribute to the achievements of other objectives of this Plan. The objectives of this policy have been discussed previously in this document.
- 5.10 Policy 3.8 - Housing Choice, confirms that taking into account local housing need, Borough’s should (a) ensure that new development offers a range of housing choices; (b) provide affordable family housing as a strategic priority; (c) build all new housing to Lifetime Homes Standards; (d) design 10% of new housing to be wheelchair accessible, or easily adaptable for residents who are

wheelchair users. The objectives of this policy have been discussed previously in this document, and the Mayor has confirmed that he is happy with the development in this respect.

**c) Climate Change**

- 5.11 Chapter 5 of the London Plan sets out London’s response to climate change. The objectives of this policy have been discussed previously in this document.
- 5.12 Policy 5.2 - Minimising Carbon Dioxide Emissions, retains the energy hierarchy of the Being Lean; Being Clean; and Being Green. Part (b) of the Policy confirms that the Mayor will work with boroughs and developers to ensure that major developments meet the following targets for carbon dioxide emission reductions in buildings. These targets are expressed as minimum improvements over the target emission rate (TER) outlined in the National Building Regulations leading to zero carbon residential buildings from 2016 and zero carbon non-domestic buildings from 2019. Policy 5.2 confirms an improvement on 2010 Building Regulations between 2010-2013 of 25% (Code for Sustainable Homes Level 4); 2013-2016 - 40%; and 2016-2031 zero carbon for residential buildings.
- 5.13 Policy 5.3 relates to sustainable design and construction; and Policy 5.4 Retro Fitting; and Policy 5.5 Decentralised Energy Networks.
- 5.14 Policy 5.6 Decentralised Energy in Development Proposals confirms that Development Proposals should evaluate the feasibility of Combined Heat and Power (CHP) Systems. Major development proposals should select energy systems in accordance with the following criteria:
- 1) Connection to existing heating or cooling networks;
  - 2) Site-wide CHP Network;
  - 3) Communal heating and cooling.
- 5.15 Policy 5.7 - Renewable Energy, confirms that major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation “where feasible”.
- 5.16 The focus on climate change is therefore on holistic carbon reduction rather than prescriptive renewable targets.

**d) Open Space**

- 5.17 Chapter 7 of the London Plan, London's Living Places and Spaces, includes policies on public realm (Policy 7.5), architecture (Policy 7.6), location and design of tall and large buildings (Policy 7.7), and heritage assets and archaeology (Policy 7.8). The objectives of this policy have been discussed previously in this document.
- 5.18 Policy 7.16 - Green Belt, confirms that appropriate development will be supported. Policy 7.17 - Metropolitan Open Land confirms that the strongest protection should be given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. Ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of MOL.
- 5.19 Policy 7.19 - Biodiversity and Access to Nature, confirms that where possible, development proposals should make a positive contribution to the protection, enhancement, creation and management of biodiversity with development proposals giving the highest protection to sites with existing or proposed national designations (SSSIs) in line with the relevant EU and UK Guidance and Regulations. Part (e) of the policy confirms that when considering proposals that would affect directly, indirectly or cumulatively a site of recognised nature conservation interest the following hierarchy will apply:
- 1) Avoid adverse impact to the biodiversity interest;
  - 2) Minimise impact and seek mitigation;
  - 3) Only in exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts, seek appropriate compensation.





**Quod**

Ingeni Building  
17 Broadwick Street  
London W1F 0AX  
020 3597 1000  
quod.com

telephone  
web