

GREATER LONDON AUTHORITY

Good Growth

Nadia Shojaie

Our ref: 2021/0289/P2I

Date: 7 June 2021

By email

Dear Nadia Shojaie

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

Site: North London Business Park, Brunswick Park Road, London, N11 1GN

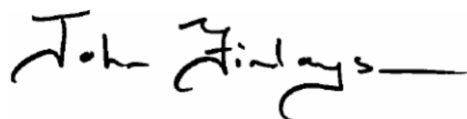
LPA: London Borough of Barnet

Our reference: 2021/0289/P2I

Further to the pre-planning application meeting held on 21 April 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

cc Allison Flight, Deputy Head of Development Management
TfL

North London Business Park

Local Planning Authority: Barnet

The proposal

Residential-led mixed-use redevelopment of the site to provide approximately 1,350 new homes, a fifth form entry secondary school, plus associated car parking, cycle parking, transport infrastructure, and landscaping.

The applicant

The applicant is **Comer Homes Group** and the architect is **Plus Architecture Limited**.

Assessment summary

The proposed uplift of residential units within a residential-led mixed use scheme could be acceptable in line with London Plan Policies S1, E1, and H1, subject to the re-provision of the school and nursery being appropriately secured. The proposal does not accord with the locational requirements of London Plan Policy D9; therefore, the applicant should continue to engage with Council and address the potential impacts of its scheme as required by London Plan Policy D9C..

There is some concern that the densities being proposed would be unsustainable given the site's location relative to public transport, town centres, and other amenities. Other matters raised in this report with respect to housing, urban design, transport, and sustainable development should be addressed in any forthcoming application.

Key next steps

The future application will need to address the issues raised in this report with respect to **land use principle, housing, urban design, transport, and sustainable development**.

Context

- 2 On 21 April 2021 a pre-planning application meeting to discuss a proposal to develop the above site for the above uses was held virtually with the following attendees:

GLA group

- Stephanie Goldberg, Case Officer
- Lyndon Fothergill, Team Leader
- Ei-Lyn Chia, Urban Design Officer
- Melvyn Dresner, TfL Spatial Planning
- Ben Stroud, Environment Team
- Rebecca Cheetham, Housing & Land

Local Authority

- Andrew Dillon, London Borough of Barnet
- Konstantinos Kalogeropolous, London Borough of Barnet

Applicant

- Nadia Shojaie, Daniel Watney
- Charles Mills, Daniel Watney
- Michael Holloway, Daniel Watney
- Dafydd Coe, HED
- Des Twomey, Plus Architecture
- David Donnellan, Comer Homes
- Jack O'Brien, Comer Group UK
- Paul Kerwood, MKPG
- Simon Young, Stomor
- Paula Cullen, Stomor

- 3 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

- 4 The 16.53-hectare site comprises four main buildings in campus style layout with multi-storey and surface car parks. The existing buildings total around 38,000 sq.m. of office and educational floorspace. The buildings have primarily been in office use since 2002 but are largely unoccupied at present. Previously, they served as the STC industrial telecoms production site and Nortel research centre. More recently Barnet Council occupied much of the office floorspace but have relocated elsewhere. The formal social hall is in occasional use as a banqueting facility and St Andrew the Apostle School occupies one of the buildings.
- 5 Approximately 13 hectares are unoccupied by buildings, comprising parkland-style landscaping, a lake, and a former sports facility at the northern end of the site. There are also several mature trees on site, many of which are protected by tree

preservation orders. The lake, which was created in the 1980s, provides functional drainage and wildlife habitat.

- 6 The site is bounded to the west by the East Coast Mainline, and to the north and south by the backs of residential properties. Access is from a short frontage on Oakleigh Road South close to the railway bridge, whilst there is also a secondary frontage and access along Brunswick Park Road. There is a significant level change of around 24 metres across the site running down from north-west to south-east.
- 7 The surrounding area is generally suburban in character, comprising predominantly two storey semi-detached and terraced housing. Although part of the site is currently designated as an industrial business park; Local Plan Policy CS3 earmarks the wider site for residential-led mixed-use development.
- 8 The site has a Public Transport Accessibility Level (PTAL) of 1a-2 on a scale of 0-6b where 6b is the highest. The nearest section of Strategic Road Network (SRN) is located approximately 2 kilometres northwest of the site at the A1000 High Road, whilst the nearest Transport for London Road Network (TLRN) is located at A406 North Circular Road Road/Bowes Road approximately 2 kilometres south-west. The nearest station, Arnos Grove Station (Piccadilly line), is located 2 kilometres to the south.

Case history

- 9 Planning permission was granted at appeal in January 2020 by the Secretary of State for a hybrid application (LPA ref 15/07932/OUT, GLA ref 2017/3664/S2) for phased comprehensive redevelopment of the North London Business Park to deliver a residential led mixed-use development, including the detailed element comprising 360 residential units in five blocks reaching eight storeys, the provision of a 5 Form Entry Secondary School, a gymnasium, a multi-use sports pitch and associated changing facilities, and improvements to open space and transport infrastructure, including improvements to the access from Brunswick Park Road and the outline element comprising up to 990 additional residential units in buildings ranging from two to nine storeys, up to 5,177 sq.m. of non-residential floorspace (Use Classes A1-A4, B1 and D1) and 2.54 hectares of public open space, and associated site preparation/enabling works, transport infrastructure and junction works, landscaping and car parking. The scheme presented at the meeting is based on this permission.

Details of this proposal

- 10 The applicant is proposing a drop-in application to amend both the detailed (phase 1) and outline (phases 2-5) elements of the consented scheme. The proposed amendments include:
 - Additional height to several of the blocks (see Figure 1)
 - Approximately 100 additional units in Phase 1
 - Revisions to the layouts of blocks C, D, E, and F (see Figure 2)
 - Revisions to the building elevation materials
 - Revisions to the floor-to-floor heights

- Revisions to the balcony strategy



Figure 1 - Proposed heights with additional storeys in blue



Typical Plan Blocks E & F: Consented Scheme



Typical Plan Blocks E & F: Proposed Redesign

Figure 2 - Proposed redesign of blocks E & F

- 11 The proposals for the school and associated sports facility which formed part of the original application are now being taken forward as a separate detailed application and as such did not form part of the proposals presented at the meeting.
- 12 The future application is expected to be referable to the Mayor under the following categories of the Mayor of London Order 2008:
 - 1A: *Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats*
 - 1C: *Development which comprises or includes the erection of a building more than thirty metres high and outside the City of London*
 - 3B: *Development which occupies more than 4 hectares of land which is used for Use Class B1 purposes and is likely to prejudice the use of that land for that use*

Strategic planning issues and relevant policies and guidance

- 13 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Barnet Core Strategy 2012,

Barnet Development Management Policies Document 2012, and the London Plan 2021.

14 The following are relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance;
- The Affordable Housing and Viability SPG;
- The Barnet Draft Local Plan (January 2020);

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

- Social infrastructure *London Plan; Social Infrastructure SPG;*
- 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; Housing SPG; Play and Informal Recreation SPG; Good Quality Homes for All Londoners draft LPG;*
- 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;*
- Transport and parking *London Plan; the Mayor's Transport Strategy;*
- Biodiversity *London Plan; the Mayor's Environment Strategy*

Summary of meeting discussion

16 Following a presentation of the proposed scheme from the applicant team, meeting discussions covered strategic issues with respect to the land use principle, urban design, transport, and sustainable development. 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

Social infrastructure

- 17 London Plan Policy S1 seeks to ensure that the social infrastructure needs of London's diverse communities are met. This policy resists the loss of social infrastructure and states that in areas of major new development that social infrastructure needs should be addressed via area-based planning such as master plans. The supporting text for this policy states that social infrastructure includes facilities for healthcare, education, community use, play, early years, recreation, sports, faith, criminal justice, and emergency facilities.
- 18 The site currently comprises a secondary school and a nursery. The extant planning permission includes the reprovision of this school; however, as noted in paragraph 10, the provision of the replacement school is subject of a separate, parallel application and therefore does not form part of these proposals. Delivery of the replacement school and nursery are expected in line with Policy S1, and therefore must be robustly secured for these proposals to be supported.

Loss of office space

- 19 London Plan Policy E1E seeks to retain existing viable office floorspace, supporting the redevelopment, renewal, and re-provision of office space where viable and the release of surplus office capacity to other uses. The proposal would result in an unspecified loss in employment floorspace over the existing site. At the meeting the applicant indicated that most of the office space on site is unoccupied and unlikely to become tenanted soon, the implication therein being that the existing quantum of office accommodation in this location is unviable. Furthermore, the acceptability of the loss in office floorspace has been established by the extant permission and is in line with the local plan policy aspirations for the site. For these reasons, the loss in office floorspace would be acceptable in line with part E of London Plan Policy E1.

Residential use

- 20 London Plan Policy H1 seeks to increase housing supply within the capital. Table 4.1 of this policy sets ten-year housing targets for net completions for each borough including a target of 23,640 for Barnet.
- 21 The proposal would deliver circa 479 residential units in Phase 1, an uplift of approximately 100 units over the consented scheme. This uplift in residential units would positively contribute towards housing targets for the borough.

Tall buildings

- 22 London Plan Policy D9 seeks to ensure that tall buildings are appropriately located, well designed and able to enhance their immediate and wider setting. In accordance with Policy D9, tall buildings should only be developed in locations that are identified as suitable in development plans, and proposals should address visual, functional, environmental, and cumulative impacts of tall buildings.
- 23 Barnet's local plan defines a tall building as one which is eight storeys or more and identifies locations where they may be appropriate. By this definition the proposal would include tall buildings.
- 24 In the Secretary of State's decision, he considers that the consented scheme is acceptable in terms of its scale, massing, and design and would not harm the character and appearance of the area, and that the tall buildings included therein

would not have an unacceptably harmful effect on their surrounds. It is noted that the Secretary of State’s decision preceded publication of the London Plan (2021), and therefore Policy D9, and that this policy was subject to directions by the Secretary of State, including the location requirements listed in part B of the policy. For these reasons and as the site is not within a designated tall buildings zone, the principle of additional height in this location cannot be considered to comply with the locational requirements of Policy D9. The applicant is therefore encouraged to continue engaging with Council to ensure the acceptability of the proposed building heights. The impacts listed in part C of Policy D9 must also be addressed in any forthcoming application.

Land use principle conclusion

- 25 The principle of redevelopment of this site to deliver an uplift of residential units within a residential-led mixed use scheme could be acceptable in line with London Plan Policies S1, E1, and H1, subject to the reprovision of the school and nursery being appropriately robustly secured. The proposal does not accord with the locational requirements of London Plan Policy D9; therefore, the applicant should continue to engage with Council and address the potential impacts of its scheme as required by part C of London Plan Policy D9.

Housing

- 26 London Plan Policy H10 states that schemes should generally consist of a range of unit sizes and sets out several factors which should be considered when determining the appropriate housing mix of a scheme. These factors include housing need and demand, the nature and location of a site, the requirement to optimise housing potential and deliver mixed and inclusive neighbourhoods. This policy also states that a higher proportion of one- and two-bed units might be more appropriate in locations with higher public transport access and connectivity.
- 27 The applicant is proposing 479 units in Phase 1 in the following unit size mix:

Table 1 - Proposed Phase 1 unit size mix

Block	1-bed	2-bed	3-bed	Total
Block C	97	49	25	171
Block D	53	82	41	176
Block E	26	38	7	71
Block F	6	32	23	61
Total	182	201	6	479

- 28 Phase 1 of the proposed development comprises a high proportion of 1 and 2-bed units. The applicant should engage with the local planning authority to ensure that the proposed unit size mix clearly addresses local needs in the area.

Affordable housing

- 29 London Plan Policies H4 and H5 seek to maximise affordable housing delivery in London. Policy H4 sets a strategic target of 50 percent of all new homes delivered across London to be genuinely affordable. Policy H5 and the Mayor’s Affordable Housing and Viability SPG establish a threshold approach to viability, whereby

schemes that achieve a minimum threshold of affordable housing with a specified tenure split, without public subsidy, while meeting other relevant policy requirements and obligations to the satisfaction of the Council and the Mayor can follow the Fast Track Route. Fast Track schemes are not required to submit a viability assessment or be subject to a late stage viability review. Schemes which do not meet these criteria must be considered under the Viability Tested Route. The applicant should note that all Stage 1 and 2 referrals following the Viability Tested Route will be required to pay the GLA's costs via an upfront payment of £10,000 plus VAT. More information on this can be found [here](#). North London Business Park is listed as an Industrial Business Park in the Barnet Local Plan and is therefore Non-Designated Industrial Land. The threshold for schemes on industrial land, such as this one, is 50 percent.

- 30 In terms of tenure mix, London Plan Policy H6 requires a minimum of 30 percent of units be low cost rented homes (London Affordable Rent or Social Rent), 30 percent intermediate products, and the remaining 40 percent to be determined by the Council as low cost rented homes or intermediate products. There is a presumption that the 40% to be decided by the borough will focus on low-cost rent, however in some cases a more flexible tenure may be appropriate, for example due to viability constraints or to achieve mixed and inclusive communities. Appropriate tenure splits should be determined through the Development Plan process or by supplementary planning guidance. In this case, Barnet's Local Plan sets a strategic target to achieve 60% of affordable housing as low-cost rent and 40% as intermediate.
- 31 The applicant will need to indicate the proposed amount of affordable housing calculated on a habitable room basis. If the proposed amount does not meet the eligibility requirements for the Fast Track Route it will need to be considered under the Viability Tested Route, as stated above. The applicant is strongly encouraged to realise the benefits of the Fast Track Route.

Children's playspace

- 32 London Plan Policy S4 requires development proposals to make provisions for play and informal recreation based on the expected child population generated by the scheme. Further detail is provided in the Mayor's 'Shaping Neighbourhoods: Play and Information Recreation' Supplementary Planning Guidance (SPG), which sets a benchmark of 10 sq.m. of usable child place space to be provided per child and makes clear that playspace must not be segregated by tenure. At minimum, playspace for children under five should be provided on-site. Offsite provision for over-fives, secured by an appropriate financial contribution, may be acceptable where it can be demonstrated that it addresses the needs of existing residents. The applicant should calculate the playspace requirement and demonstrate how it will be met as part of any forthcoming application. The on-site play provision must be retained in perpetuity, not be segregated by tenure and be secured by condition.

Urban design

Optimising residential density

- 33 The application site is in a PTAL 1-2 location and does not have good access to town centres, jobs, or services by public transport, walking and cycling.

- 34 The applicant is proposing a residential density and massing that are comparable to developments in urban settings with much higher levels of connectivity, more infrastructure, and better access to amenities. The public value of increasing density in an unsustainable location is not justified and would encourage a car-led development. The applicant should therefore seek to reduce the proposed density in view of the site's relatively remote location.

Development layout

- 35 The applicant is not proposing any alterations to the layout of the masterplan; however, they are seeking to enhance the overall density of the scheme. These changes may impact the functionality of the proposed layout.
- 36 The applicant should provide information on the impact of the additional units on the ground level condition. This should demonstrate how increased levels of servicing and maintenance will be accommodated and its impact on the public realm.

Scale and massing

- 37 As stated earlier in this report, the proposed heights would not comply with the locational requirements of London Plan Policy D9 and any application would need to demonstrate how the proposals address the impacts identified in part C of that policy.

Residential quality

- 38 The proposal seeks to increase the number of residential units in Blocks C, D, E and F by reducing the overall number of cores. This has resulted in long enclosed corridors and an increase in single aspect units. The proposed internal modifications would reduce the residential quality of the scheme and are not supported. The applicant should revise the layout to ensure the provision of dual aspect dwellings is maximised and ensure single aspect three-bedroom units are designed out of the scheme.
- 39 An efficiency review of the outline phases of the masterplan was undertaken to explore the principle of additional height across the masterplan. Residential units facing the railway tracks should be prioritised as dual aspect to provide an alternative outlook and to reduce exposure to noise.

Fire safety

- 40 In line with Policy D12 of the London Plan 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.
- 41 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

- 42 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.
- 43 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.
- 44 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.

Transport

Transport assessment

- 45 The application should be supported by a Transport Assessment in accordance with TfL guidance. A Construction Logistic Plan should also be submitted alongside the application. A pre-application meeting to discuss transport matters may also be helpful in this instance and the relevant information can be found [here](#).
- 46 The applicant will need to provide assurance that the proposed development would accord with the strategic transport policies of the London Plan including a clear demonstration of the development's impacts on the public transport and highway networks. The applicant should ensure the development supports London-wide and the related local mode shift targets, promotes active travel and the healthy streets approach.
- 47 Given the site history, the Transport Assessment should set out any public transport mitigation and offsite highway works with reference to the existing planning position on site, as well as set out where any additional mitigation may be necessary in relation to the latest proposals.

Healthy Streets

- 48 The proposed pedestrian and cycle routes accord with Healthy Streets approach and efforts to improve wider connectivity and are likewise welcomed. The applicant should ensure that all designs accord with guidance on Healthy Streets.

- 49 Cycle parking arrangements should be reviewed to ensure accordance with London Cycle Design Standards and new cycle route quality criteria, as this has changed since the extant permission was granted. This should form part of the wider Active Travel Zone (ATZ) assessment, which is required within the Transport Assessment. ATZ guidance and can be found [here](#).

Public transport impacts

- 50 Bus demand as primary mode and as a sub-mode to access the wider rail network will need to be assessed. For rail impact, line loading and station impact assessments at London Underground stations will need to be undertaken, as well as for the national rail network. Open source data is published to assist this aspect of the assessment. This development is of sufficient scale to consider strategic modelling. More info can be found [here](#) about the latest models and [here](#) regarding the approach to strategic modelling and development.

Sustainable development

Energy strategy

- 51 Applicants should follow the [GLA Energy Assessment Guidance 2020](#) which sets out the information that should be provided within the energy assessment as part of the application..

Net zero carbon target

- 52 The London Plan 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.
- 53 Applicants should submit a completed [Carbon Emissions Reporting spreadsheet as part of their](#) 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.
- 54 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

- 55 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
- 56 Current documentation indicates that the applicant is targeting 9% for the detailed element. The applicant is encouraged to fully investigate all measures for improving energy efficiency savings to 10% prior to Energy Statement submission. All measures considered should be clearly outlined and robust arguments (technical/design) should be presented for any measures that do not form part of the proposals. Confirmation of the outline specification should also be provided to inform any conditions for the future Reserved Matters Applications.
- 57 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. This should be considered for all heating options for the masterplan (site-wide network, communal block solutions and the proposed EAHP).
- 58 As discussed in the meeting, the current proposals are not aligned with the heating hierarchy and a site wide network should be proposed. The applicant must fully and robustly outline all barriers to communal heating before an individual heating system can be considered. It should be noted that the GLA considers that district heating can help to minimise energy costs if appropriately designed.

Energy flexibility

- 59 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. Energy flexibility should be considered for all heating options for the masterplan.

Cooling and overheating

- 60 The Good Homes Alliance (GHA) [Early Stage Overheating Risk Tool](#) should be submitted to the GLA alongside the application to identify potential overheating risk and passive responses early in the design process.
- 61 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.
- 62 The area weighted average (MJ/m²) 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

- 63 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.
- 64 Full engagement on the potential opportunities for future DHN connection should be explored and agreed with the Barnet energy officer. It is noted that the site is not currently within a heat network priority area; however, due to its size the masterplan is expected to follow the heating hierarchy and propose site wide/communal heating where this is feasible. Communal heating is considered a reasonable route for providing heating technology flexibility and resilience.
- 65 The site should propose a single point of connection for a future DHN or demonstrate that connections to each plot are feasible through protected routes through the sites and suitable allowances and positioning of DHN trenches within an utility corridor cross sections.
- 66 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. As per above point, the GLA consider the use of EAHPs to be incompatible with DHN connection and that should future DHN connection become available connection could only be achieved through expensive retrofit measures.
- 67 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.
- 68 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

- 69 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.
- 70 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.
- 71 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.

72 Should all options for the masterplan be presented then the EAHPs should be provided with additional evidence around the proposed operation and control of the system. The GLA has concerns around the delivery of heating via the ventilation system. It should be confirmed if periods of high heat demand would require 'over-ventilating' the dwellings considering the proposed fabric energy efficiency measures.

73 Ambient loops are not currently proposed but could offer opportunities for energy recovery if heat rejection is expected within the masterplan. This approach would be dependent on the acceptability of any identified DHN stakeholders.

Carbon offsetting

74 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.

75 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

76 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 application, 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

- 77 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

- 78 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, and hedgerows should all be considered for inclusion and the opportunity for ground level urban greening should be maximised. The applicant must calculate the Urban Greening Factor as set out in London Plan Policy G5 and seek to achieve the specified target prior to the Mayor's decision-making stage. A landscaping plan should also be provided.

Sustainable drainage and flood risk

- 79 The drainage strategy should aim to reduce surface water discharge from the site to greenfield rates in accordance with London Plan Policy SI13. Where greenfield runoff rates cannot be achieved and robust justification is provided, a discharge rate of three times the greenfield rate may be acceptable.
- 80 The drainage strategy should maximise opportunities to use Sustainable Drainage System (SuDS) measure at the top of the drainage hierarchy, as set out in London Plan Policy SI13. Roofs and new public realm areas present an opportunity to integrate SuDS such as green and blue roofs, tree pits, and permeable paving into the landscape, thereby providing amenity and water quality benefits.

Circular economy

- 81 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.
- 82 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. The applicant is therefore required to submit a Circular Economy Statement in accordance with the GLA [guidance](#).

Conclusion

- 83 The proposed uplift of residential units within a residential-led mixed use scheme could be acceptable in line with London Plan Policies S1, E1, and H1, subject to the reprovision of the school and nursery being appropriately secured. The proposal does not accord with the locational requirements of London Plan Policy D9; therefore, the applicant should continue to engage with Council and address the potential impacts of its scheme as required by London Plan Policy D9C.. There is some concern that the densities being proposed would be unsustainable given the site's location relative to public transport, town centres, and other amenities. Other matters raised in this report with respect to housing, urban design, transport, and sustainable development should be addressed in any forthcoming application.

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