

**Grahame Park Estate: Plots 10, 11 and 12****in the London Borough of Barnet****planning application no. 17/2840/OUT****Strategic planning application stage 1 referral**

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

**The proposal**

Hybrid application seeking outline permission for the demolition of 630 existing residential units, GP practice, community hall, library and retail units and the construction in three phases (plots 10, 11 and 12) of: 1083 residential units; a Community Hub (comprising a community hall and workshop rooms, a daycare nursery, a GP Health centre, community health facilities and ancillary office accommodation ) along with cafe; retail space; a flexible ground floor space within Block 10B; a new energy centre to provide district heating; and associated car parking, open space, landscaping and access arrangements. Full details are submitted for access, layout, scale, appearance and landscaping of plots 10, 11 (with the exception of Plot 11B) and 12. Full details of Plot 11B are submitted for layout and scale, with access, appearance and landscaping to be dealt with as reserved matters.

**The applicant**

The applicant is **Genesis Housing**, and the architect is **Tibbalds/Mae Architects**.

**Strategic issues**

**Housing:** The loss of social rented units is wholly unacceptable. The initial viability assessment demonstrates that more social rented units could be provided. GLA officers will work with the applicant and the Council to ensure that the application accords fully with the Mayor's Estate regeneration BPG, Affordable Housing and Viability SPG, and the London Plan (paragraphs 22-36 and 42-48).

**Urban design.** The overall strategy and levels of residential quality are supported, although further work is required to address blank frontages and details are required in relation to the design of Plot 11 and Block 10A. (paragraphs 51-58).

**Climate change:** The application is broadly compliant with London Plan policy on climate change mitigation, subject to securing an appropriate carbon offset payment and the provision of information verifying this compliance. (paragraphs 59-62).

**Transport:** Car parking should be reduced and cycle parking provision increased in line with London Plan policy. The applicant should also clarify arrangements for ambulance parking and provide further information in relation to bus priority measures and the cycling strategy. (paragraphs 63-67).

**Recommendation**

That Barnet Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph of this report; but that the possible remedies set out in paragraph 73 of this report could address these deficiencies.

## Context

1 On 31 May 2017 the Mayor of London received documents from Barnet Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 12 July 2017 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The consultation period has been extended to 11 September 2017 with the agreement of Barnet Council. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following Categories of the Schedule to the 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 (c) more than 30 metres high and is outside the City of London."*

3 Once Barnet Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## Site description

6 The Grahame Park estate is the largest housing estate in the London Borough of Barnet, with 1,777 homes and is situated within the Colindale/ Burnt Oak Opportunity Area, as identified by the London Plan. Built in the 1970s on the site of the former Hendon Aerodrome, it is bounded by Lanacre Avenue to the west, Grahame Park Way to the south and east, and Filed Mead to the north.

7 The application site relates to the part of the estate around what is known as 'the Concourse' and is bound by Lanacre Avenue to the west and the rest of the Grahame Park Estate to the north, east and south. In the 2016 Grahame Park estate SPD this site is Plots 10, 11 and 12 within Stage B.

8 Quakers Close bus stop is within the site boundary and serves the 186, 204, 303 and N5 routes and the 632 and 642 can be accessed from Corner Mead to the north east. The nearest underground station is Colindale on the Edgware branch of the Northern Line, 800 metres to the west. National Rail services can also be accessed from Mill Hill Broadway, 2 kilometres to the north. As a result the Public Transport Accessibility Level varies between 2 and 3 across the site, on a scale of 1 to 6b, indicating a poor level of public transport accessibility.

## Details of the proposal

9 The Grahame Park estate SPD splits the estate regeneration into Stages A and B. Stage A has now mostly been delivered and Stage B is broken into three phases. The development proposals cover Phase 1, which includes “the Concourse”, containing much of the retail floorspace used by the residents of the estate, and a small part of Phase 3, currently occupied by the existing energy centre. Figure 1 shows the application boundary and how this relates to the SPD phases.

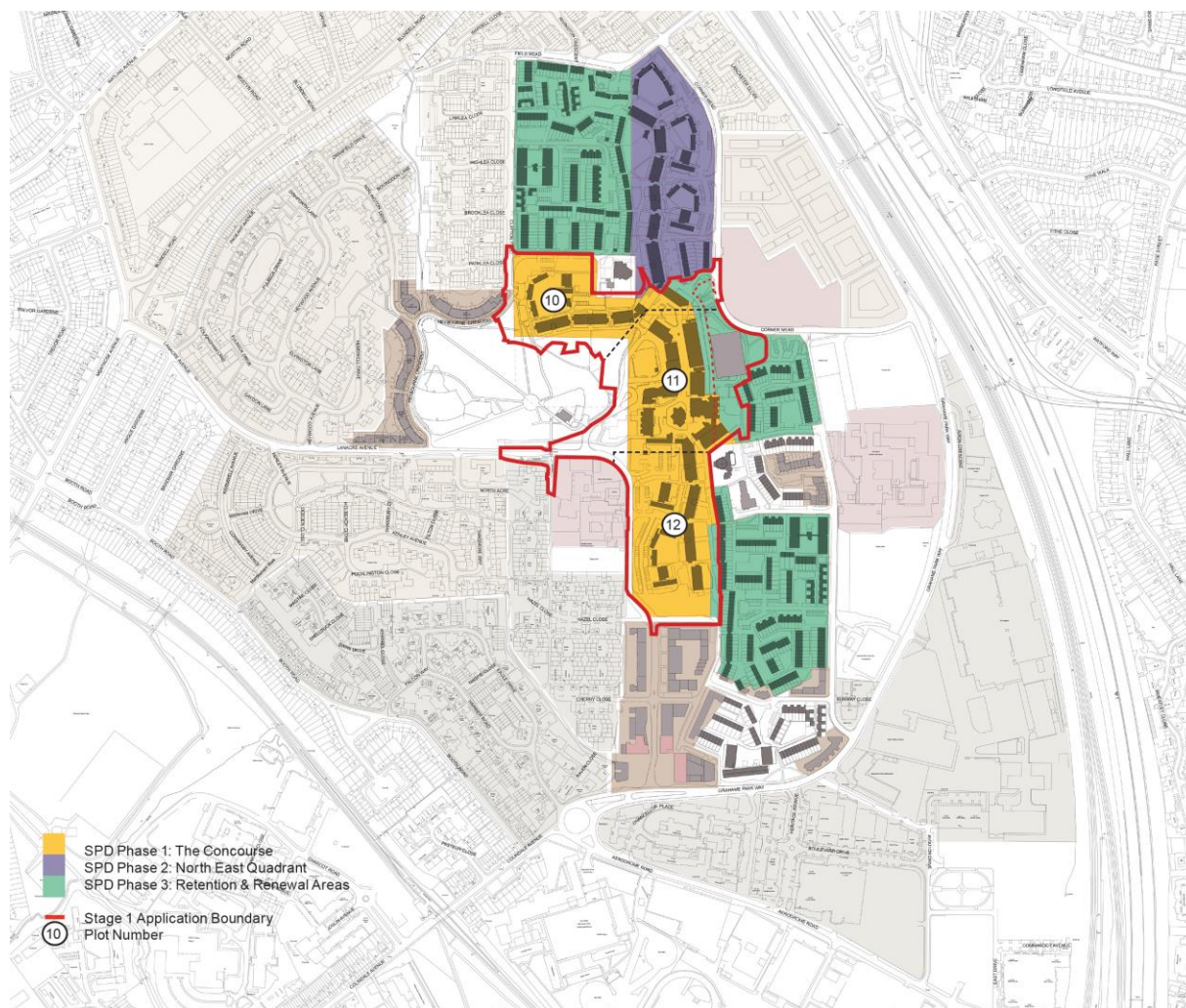


Figure 1: Application site boundary, Grahame Park estate SPD Phases and plots 10, 11 and 12.  
Note: The site encompasses all of Phase 1 and part of Phase 3.

10 There are currently 630 residential units within the application boundary. The applicant proposes demolition of these units and associated retail floorspace and replacement with:

- 1,083 new residential units.
- A community hub. This comprises an entrance and reception area, a 250 sq.m. multi-purpose hall, a community workshop providing flexible space, a day care nursery for 75 children with secure outdoor space, a cafe, a GP surgery sized to serve 15,000 patients, accommodation for childrens services and community health facilities and ancillary office accommodation.

- Retail floorspace.
- Energy centre housing two CHP gas engines.

11 The application is hybrid, with full details submitted for access, layout, scale, appearance and landscaping of plots 10, 11 (with the exception of Plot 11B) and 12. Full details of Plot 11B are submitted for layout and scale, with access, appearance and landscaping to be dealt with as reserved matters. Table 1 shows how the proposed land uses breakdown.

<b>Proposed Use class</b>	<b>Floorspace (GIA in sq.m.)</b>
Residential	102,618
Energy centre	323
Retail	395
Cafe	186
Nursery	683
Health	2,009
Community	1,074
<b>Total</b>	<b>107,288</b>

*Table 1: Proposed floorspace breakdown by land-use*

## Case history

12 A masterplan was consented in 2004 and a small part of the estate has been subsequently redeveloped, but in order to guide further regeneration Barnet Council have reviewed the masterplan, amended it and produced the Grahame Park SPD. This document splits the estate regeneration into Stages A and B. The boundaries of Stage A correspond to the 2004 outline consent, which was for the demolition of 1,314 residential units and retail floorspace and the provision of 2,977 new residential units and 9,074 sqm of commercial and community floorspace. In 2011 a Section 73 application was submitted to Barnet Council to vary conditions attached to the original consent and in 2012 a commensurate deed of variation to the s106 was agreed, establishing that Stage A would only deliver 953 units in total. Stage A has since been part implemented through a range of detailed applications and reserved matters. It is understood that Stage A has now mostly been delivered.

13 Stage B is broken into three phases by the SPD. The development proposals seek to respond to the SPD and cover Phase 1, which includes “the Concourse”, containing much of the retail floorspace used by the residents of the estate, and a small part of Phase 3, currently occupied by the existing energy centre.

14 Pre-application meetings were held between GLA officers and the applicant on 1 February 2017 and 12 April 2017.

15 GLA officers acknowledged the scheme’s potential to provide a significant number of new homes and bring forward new social infrastructure and retail provision for new and existing residents. Notwithstanding this, it was emphasised that the like for like reprovision of existing

affordable housing was paramount. The design of the scheme was considered to be generally good but some further work was required in with regards to the form and layout of some blocks, and the relationship between some buildings and the public realm. Further work was also required with regards to climate change mitigation and transport.

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

16 The relevant issues and corresponding policies are as follows:

- Housing and affordable housing *London Plan; Housing SPG; Housing Strategy; Affordable Housing & Viability SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG; Draft Estate Regeneration BPG*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- Transport *London Plan; the Mayor's Transport Strategy*

17 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 and Development Management Policies (2012), and the London Plan 2016 (The Spatial Development Strategy for London Consolidated with Alterations since 2011).

18 The following are also relevant material considerations:

- The National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance.
- Colindale Area Action Plan (2010).
- Grahame Park SPD (2016).

## **Principle of development**

### Opportunity Area

19 London Plan Policy 2.13 explains how development proposals within opportunity areas should support the Mayor's strategic policy directions, and London Plan Annexe 1 indicates that the Colindale/ Burnt Oak Opportunity Area has potential for a minimum of 2,000 new jobs and 12,500 new homes.

20 Grahame Park Estate is one of the main sites within the opportunity area with capacity to meet these minimum guidelines through delivery of residential-led mixed use development, however, it is noted that appropriate developer contributions are needed to deliver public transport improvements to support such development.

21 The application seeks to deliver an uplift of new homes and social infrastructure on a key development site within the Colindale/ Burnt Oak Opportunity area and therefore broadly accords with the directions set out in the London Plan.

## Estate Regeneration Best Practice

22 The Mayor has identified affordable housing as one of his key priorities, and is committed to ensuring the successful regeneration of London's housing estates. In line with the Mayor's draft Best Practice Guidance on Estate Regeneration, applicants are expected to set out:

- Details of a full and transparent consultation and engagement between the applicant and existing residents.
- Details of how the proposals offer full rights to return for displaced tenants and a fair deal for leaseholders.
- How demolition will only be allowed where it does not result in a net loss of social housing, or where all other options have been exhausted.

23 The applicant has provided a statement of community involvement and a statement of consultation setting out the details of the consultation process relating to the Grahame Park SPD, and how representations have been addressed. At Stage II Barnet Council will be expected to provide further information setting out the consultation arrangements relating to the current planning application.

24 Of the existing residents, 47 are on social rented secure tenancies. It is proposed that 39 of these would be reprovided within the proposed affordable housing in order to re-house the existing social rent tenants, with the remaining eight tenants being housed elsewhere either through choice or because of a need (such as sheltered accommodation). The specific financial arrangements relating to the freeholders and leaseholders have not been set out. The applicant should provide this information before the Mayor sees this application again.

## Reprovision of social rented accommodation

25 London Plan Policy 3.14 resists the loss of housing, including affordable housing, unless it is replaced at existing or higher densities with at least equivalent floorspace. The Mayor's Affordable Housing and Viability SPG makes it clear that, with applications relating to housing estate renewal, such cases schemes are required to ensure that existing affordable housing is replaced on a like-for-like basis with better quality accommodation, providing at least the equivalent floor space of affordable housing. There should be no net loss of existing affordable housing tenures (including social rented accommodation).

26 At the pre-application stage the applicant was advised that the application could be supported in principle in a scenario whereby more than 50% affordable housing was achieved, as long as it could also be demonstrated that the affordable tenures were replaced on a like-for-like basis. Information provided by the applicant and Barnet Council officers has since enabled a more holistic assessment of this application and the wider Grahame Park estate renewal programme against this expectation.

27 The application broadly covers the second phase of what is envisaged to be a four phase renewal of the Grahame Park Estate. In order to contextualise the proposals Table 2 sets out how the current application fits within the overall programme in terms of overall housing numbers and tenure split.

Stage/ Phase	Private  (includes purchased under 'right to buy')	Affordable tenures			Units demolished	New units	Original units
		Social rent	Affordable rent	Intermediate			
Original estate	412	1,365	0	0			1,777
A	331	235	38	80	284	684	
B:1	431	39	319	294	630	1,083	
End of B:1	762	274	357	374	914	1,767	863
B:2	300 (Estimated)					300	
B:3	800 (Estimated)					800	
End of programme	1,091 social rented units would have to be provided in B:2 and B:3 to avoid net loss				1,777	2,867	0

*Table 2: Projected change in housing numbers and tenure split over estate regeneration programme*

28 Having started with 1,777 residential units, 1,365 of which were social rented units, the estate is projected to have approximately 2,867 units at the end of the delivery programme. The full details for Stage B Phases 2 and 3 are yet to be determined, and the tenure splits unknown. It can be seen, however, that these phases would need to provide 1,091 social rented units in order to avoid an overall loss of social rented accommodation. Given that these phases only envisage delivery of around 1,100 units between them, this is an unrealistic expectation. The current delivery programme is therefore likely to deliver a significant loss of social rented accommodation.

29 Cumulatively, at the end of Stage B Phase 1 (as envisaged by this application) there would be a total of 1,767 new units on the estate, and 863 of the original units remaining. Of the new units, 274 would be social rent, 357 affordable rent and 374 intermediate shared ownership units.

30 Table 3 relates purely to the current application and sets out existing and proposed units and floorspace by tenure. Of the 1,083 new units, 652 will be affordable housing tenures. This represents an uplift of 95 affordable housing units, or 15,948 sq.m. of affordable housing floorspace.

31 The proposals would provide an uplift in housing units and residential floorspace and the current affordable housing offer represents 62% by habitable room. There would also be an increase in the overall level of affordable housing by both units and floorspace, but not on a like for like basis. The applicant proposes that the 557 existing social rented units be replaced by a mixture of 39 Social Rent, 153 London Affordable Rent, 166 London Living Rent and 294 Intermediate Shared Ownership units. This represents a net loss of 518 social rented homes within the current application, which is wholly unacceptable.

Tenure	Existing units	Existing floorspace (GIA)	Proposed units	Proposed floorspace (GIA)
Social rent	557	46,447	39	3,578
London affordable Rent			153	15,319
London Living Rent			166	16,610
Shared Ownership			294	28,311
Market	73	6,049	431	38,800
Total	630	52,496	1,083	102,618

*Table 3: Existing and proposed levels of affordable housing*

32 The applicant contends that the proposed mix is driven by viability and that further re-provision of social rented units would be unviable. The applicant is in ongoing discussions with GLA Housing & Land with regards to the availability of grant funding which affects the viability of the scheme and the final level and mix on affordable housing tenures that could be delivered. The FVA provided shows how this grant has been included.

33 Barnet Council is not seeking an independent assessment of the Financial Viability Assessment (FVA) submitted, therefore GLA officers have conducted an initial assessment. A detailed note has been sent under separate cover to the applicant, but the following gives brief commentary on the initial assessment and the issues raised.

34 The FVA has been prepared in general compliance with the Mayor's Affordable Housing and Viability SPG, with a few variations. Many of the assumptions used can be accepted, however, questions are raised in relation to benchmark land value, values assumed for the community hub and affordable rent units and site assembly costs. As such it is assessed that the scheme could be undervalued by around £17 million and therefore it is reasonable to consider that the application could provide a mix that includes more social rented housing.

35 The proposals would involve a significant loss of social rented units within this phase, and the wider programme is likely to deliver a very significant loss of social housing unless the current application is amended to address this.

36 The overall level of affordable housing is 62%. In light of the initial assessment of the applicant's FVA the significant loss of social rented units is, however, wholly unacceptable within the context of London Plan Policy 3.14 and the Mayor's Affordable Housing and Viability SPG. The principle of the estate renewal cannot be supported until this is addressed. GLA officers welcome further discussions with the applicant and Barnet Council in order to agree a satisfactory solution. The Housing section of this report gives advice on the kind of unit size and tenure mix that would be acceptable should a satisfactory solution be agreed. Any s106 agreement agreed will be expected to include early and late stage review mechanisms, in line with the Mayor's Affordable Housing and Viability SPG.