



JULY 2020

# B&Q Cricklewood Broadway Retail Park

## Planning Statement

Iceni Projects Limited on behalf of  
Montreaux Cricklewood Developments Ltd

July 2020

ICENI PROJECTS LIMITED  
ON BEHALF OF  
MONTREAUX  
CRICKLEWOOD  
DEVELOPMENTS LTD

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**B&Q Cricklewood**  
PLANNING STATEMENT

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# 1. INTRODUCTION

- 1.1 This Planning Statement has been prepared by Icen projects Limited ('Iceni') on behalf of Montreaux Cricklewood Developments Ltd ('The Applicant') in support of an outline planning application at B&Q Cricklewood, Broadway Retail Park, NW2 1ES (the 'site').
- 1.2 This outline planning application submission relates to the redevelopment of a key brownfield site to provide up to 1,100 new residential dwellings (including BtR homes) and up to 1,200 sq.m of flexible commercial and community uses at ground floor level (flexible A3/B1/D1/D2). Further details of the proposals are set out in the main body of this Planning Statement.
- 1.3 As detailed further within this Planning Statement, an Illustrative Masterplan has been prepared for the whole Site to ensure it is comprehensively planned with a set of Parameter Plans and Design Guidelines submitted for approval to help control future Reserved Matters Planning Applications ('RMA's). All matters relating to layout, scale, appearance and landscaping are reserved for future determination.
- 1.4 The Applicant is therefore seeking planning permission for:

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*Outline planning application (including means of access with all other matters reserved) for the demolition of existing buildings and comprehensive redevelopment of the site for a mix of uses including residential C3 and flexible commercial and community floorspace in uses classes A3/B1/D1 and D2; car and cycle parking; landscaping; and associated works.*

- 1.6 The Site is located within the Brent Cross and Cricklewood Opportunity Area and along the Edgware Road, key corridor of change, which is designated as an area for major housing and employment growth – within both the London Borough of Barnet's (referred to herein as 'the Council') Local Plan and the adopted London Plan. The Site also lies directly adjacent to Cricklewood Railway Station and District Town Centre (with a PTAL 4-6 across the Site) comprising an established urban area with a mixture of residential, retail and commercial uses. As such, it represents a pivotal brownfield opportunity for optimising higher-density development which is further supported by national policy objectives.
- 1.7 The proposals provide much needed housing for the borough and represent a suitable and sustainable re-use of the Site which will contribute to the continued vitality and viability of Cricklewood.

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## **The Applicant and Land Ownership**

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- 1.8 Montreaux Cricklewood Development Ltd are the freehold owners of the Site. Details of the Site ownership boundary are provided on the submitted Site Location Plan.

## **Community Infrastructure Levy**

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### **London Borough of Barnet Community Infrastructure Levy (CIL)**

- 1.9 With reference to the Council's Community Infrastructure Levy Charging Schedule ('CIL') 2013 LBB sets CIL Levy Rates (index linked) as follows:
- £135 residential (C1-C4, Sui Generis HMOs) excluding ancillary car parking;
  - £135 Retail (A1-A5) excluding ancillary car parking; and
  - £0 All other use classes.

### **London Mayoral Community Infrastructure Levy ('MCIL') (2019)**

- 1.10 With reference to the 'Community Infrastructure Levy Charging Schedule – Mayor of London' (2019), the London Borough of Barnet ('LBB') falls within the MCIL 'Charging Zone 2' whereby all development involving the creation of new floorspace is subject to a CIL Levy rate of £60.00/sqm (with reference to 'Table 1: MCIL2 Charging Rates for all Development in London'). As such, the proposals are also liable to the London Mayoral CIL Levy.
- 1.11 An Additional CIL Information form is submitted with this planning application. This sets out illustrative floorspace figures for relevant uses. Detailed CIL calculations will be subject to Indexation and a full review at determination stage.

## **Pre-application Discussions**

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### **London Borough of Barnet**

- 1.12 The project has been subject to extensive pre-application discussions and advice in advance of the planning application submission.
- 1.13 Five pre-application meetings have been held with the Council's Planning, Design, Transport and Conservation Officers. The first inception meeting took place on the 24th May 2019, with a Planning Performance Agreement ('PPA') signed between the Council and Montreaux on 11th June 2019, formalising the dialogue on the site and an agreement to a series of meetings. Further PPA meetings have been held on the 24th June 2019, 16th August 2019, 27th September 2019 and on the 12<sup>th</sup> December 2019. Feedback received from Officers to date has been carefully considered throughout the design evolution of the proposals and has informed the submission presented herein. Following a the PPA dialogue, Officers have raised no objection to the principle of the comprehensive

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redevelopment of the Site for up to 1,100 residential units (including a proportion of Build to Rent' 'BtR') and complimentary flexible commercial uses. However, this is subject to relevant planning policies and material considerations at the planning determination stage. A summary of the key headlines is included below, with a detailed summary in the submitted Design and Access Statement and ES.

- 1.14 The first inception meeting focused primarily on the initial vision and aspirations for Site, including the general masterplan layout, opportunities and key considerations, initial placement of height and agreement on the Outline planning application approach. Notably, it was acknowledged that the Site is a key transition site which should seek to create a sense of arrival and presence given the adjacent situation of Cricklewood Train Station which is currently lacking. In this regard, Officers recommended exploring the option of including a marker building, versus having a sequence of similar heights across the Site. Officers also highlighted that commercial uses should support the existing commercial offering in the District Town Centre, with the placement of open space recommended to be reviewed in order for Officers to gain a better understanding of scale. Officers also highlighted the presence of an existing, closed underpass which formerly connected the Site to the Train Station whereby it was suggested that a portion of land in the south-east corner of the Site be safeguarded for any possible future access requirements. This is included on the submitted, Illustrative Master Plan and Key Access and Circulation Parameter Plan.
- 1.15 In accordance with feedback at the inception meeting, pre-application meeting number 2 (24.06.19) focused on a refinement to the landscape vision with an objective of enhancing permeability and legibility – in tandem with presenting options with regards to massing. The provision and sequence of open space across the Site was welcomed, including next to Karaway Playground (in line with Officer feedback) and improving linkages to/from Cricklewood Lane. Officers also welcomed the principle of a new marker building next to the Station but recommended that this was decreased from the current 27 storeys (albeit acknowledging that a taller building would likely be acceptable given the Site's situation in the OA).
- 1.16 At pre-application meeting numbers 3 and 4 (16.08.19) Officers were encouraged by the re-orientation of development block next to Cricklewood Lane and reduction in the overall height to 25 storeys. It was felt that this enhances a sense of arrival as you exit through the underpass from Cricklewood station. However, Officers outlined that proposed development heights will be a key consideration which will need to be justified through technical testing.

#### **Greater London Authority ('GLA')**

- 1.17 Montreaux have also engaged in pre-application discussions with the GLA, with a meeting held on the 14th November 2019, whereby strategic level support was established for the comprehensive redevelopment of the Site as a residential led mixed-use proposal. The GLA also supported the

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quantum of development, deemed appropriate given the highly sustainable nature of the Site close to Cricklewood Station. TFL confirmed that they were happy with the 10% car parking provision across the Site, in line with Draft London Plan ('DLP') policy.

- 1.18 The GLA issued a formal written response in February 2020. The report concluded that the proposed redevelopment of the Site to provide a residential-led scheme comprising up to 1,250 units (discussed at pre-application stage) was strongly supported in principle. Further the height and massing were supported, subject to consideration of the impact on the setting of heritage assets and townscape.

### **Stakeholder Engagement**

- 1.19 Detailed discussions have been ongoing since early 2019 with a range of stakeholders and statutory consultees. As outlined above, several iterations of the scheme have been presented through pre-application discussions with LBB officers.
- 1.20 The proposals have also been subject to engagement with local residents, Ward Councillors, businesses and community groups – as detailed within the submitted Statement of Community Engagement. In total eight meetings have been held with community groups, with a project website developed to share information and updates on the proposals.
- 1.21 Two public consultation events were held in February 2020 at Ashford Place, attended by 143 local people. The events was advertised with 5,298 flyers delivered door to door to addresses in Barnet, Brent and Camden. This aimed to increase the understanding of local needs and aspirations of all stakeholders and raise awareness of the regeneration proposal. In summary the feedback from these events was constructive, with a general understanding of the community benefits of the proposal in terms of public space, landscaping design and enhancement of Cricklewood Green through increasing permeability and outlook.

### **Environmental Impact Assessment ('EIA')**

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- 1.22 A Request for an Environmental Impact Assessment ('EIA') Screening Opinion to assess the proposals against the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) was prepared and submitted to The Council as the determining planning authority.
- 1.23 A Screening Opinion was received from The Council on 19<sup>th</sup> February 2020, confirming that the proposals constitute EIA development falling under Schedule 2 (10) (b) Infrastructure Projects – Urban Developments category of the EIA Regulations, exceeding the development threshold for this category. Given the scale of the proposed development, the location of the Site and the potential for environmental effects. The development is considered to constitute an 'EIA Development' under the EIA Regulations with the following matters scoped into the Environmental Statement:

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- Chapter 8: Air Quality;
  - Chapter 9: Archaeology;
  - Chapter 10: Climate Change;
  - Chapter 11: Daylight, Sunlight & Overshadowing;
  - Chapter 12: Ground Conditions and Contamination;
  - Chapter 13: Noise & Vibration;
  - Chapter 14: Socio-economics and Health;
  - Chapter 15: Traffic and Transport; and
  - Chapter 16: Wind Microclimate.

1.24 The following non-technical chapters are also provided as part of ES Volume I:

- Chapter 1: Introduction;
- Chapter 2: Planning Policy Context;
- Chapter 3: Existing Site and Surroundings;
- Chapter 4: Alternatives and Design Evolution;
- Chapter 5: The Proposed Development;
- Chapter 6: Demolition and Construction;
- Chapter 7: EIA Methodology;
- Chapter 17: Effect Interactions;
- Chapter 18: Summary of Mitigation; and
- Chapter 19: Residual Effects and Conclusions.

1.25 Accordingly, AECOM have prepared an ES with input from the relevant technical consultants, ES Volume II covers Townscape, Visual Impact and Built Heritage Assessment and ES Volume III comprises a complete set of technical reports.



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## Submission Documents

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- 1.26 The following documents and drawings (Table 1.1 and Table 1.2) have been prepared by the consultant team and are submitted in support of this planning application. Notably, the submission documents are in accordance with the London Borough of Barnet ('LBB') Validation Requirements for planning applications of this nature.

**Table 1.1 Planning Documents**

Documents	Consultant
Planning Application Fee	The Applicant
Application Form and Ownership Certificates	Iceni Projects Limited
Covering Letter	Iceni Projects Limited
Community Infrastructure Levy Additional Information Form	Iceni Projects Limited
Planning Statement	Iceni Projects Limited

**Table 1.2 Technical Documents**

Documents	Consultant
Environmental Statement	AECOM
Air Quality Assessment	AECOM
Arboriculture Impact Assessment	AIA
Archaeology DBA	AECOM
Daylight and Sunlight Assessment	GIA
Energy and Sustainability Statement	Meinhert
Flood Risk Assessment	AECOM
Foul Water Drainage and Utilities	AECOM
Noise Impact Assessment	AECOM
Operational Waste Management Strategy	AECOM
Rapid Health Impact Assessment	AECOM
Statement of Community Involvement	Iceni
TVIA	Montagu Evans
Transport Assessment	Entran
Telecommunications	G-Tech
Travel Plan	Etran
Wind Microclimate	RWDI
Viability Statement	Montagu Evans

**Table 1.3 Drawing & Design Documents - for approval**

Drawing / Document	Document Reference	Consultant
Design Guidelines (Part 1-2)	10965-20200731	EPR/ Exterior
Site Location Plan (incl. Red Line Boundary)	10965-EPR-XX-XX-DR-A-TP-0100	EPR
Development Heights Plan	10965-EPR-XX-XX-DR-A-TP-0104	EPR
Development Parcels Plan	10965-EPR-XX-XX-DR-A-TP-0102	EPR
Demolition Plan	10965-EPR-XX-XX-DR-A-TP-0101	EPR
Phasing Plan	10965-EPR-XX-XX-DR-A-TP-0105	EPR
Key Points of Access and Circulation	10965-EPR-XX-XX-DR-A-TP-0103	EPR

**Table 1.4 Drawings, Plans & Design Documents - Illustrative only**

Document	Document Reference	Consultant
Illustrative Masterplan	10965-EPR-XX-GF-DR-A-TP-0200	EPR
Indicative Visualisations (Part 1-2)	10965-20200731	EPR
Masterplan Design Access Statement (Incl. Fire Safety Strategy) (Part 1-9)	10965-20200731	EPR/ Exterior

### **Structure of Planning Statement**

1.27 The purpose of this Planning Statement is to provide the Council with details of the existing site and surroundings; the relevant planning history of the Site; details of the proposed development and a reasoned justification in the context of the local area and relevant planning policies. This Planning Statement is structured as follows:

- **Section 2-** The Site and Surroundings;
- **Section 3-** Planning History
- **Section 4-** Proposed Development;
- **Section 5-** Planning Policy;
- **Section 6-** Assessment of Key Planning Considerations;
- **Section 7-** Summary of Supporting Technical Materials; and
- **Section 8-** Summary and Conclusions.

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## 2. SITE AND SURROUNDING CONTEXT

### Site Location and Description

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- 2.1 The Site area is approximately 2.78 ha located in Cricklewood, within the London Borough of Barnet. Currently the brownfield site is occupied by a range of retail outlets, including a large B&Q, Pound Stretcher and Tile Depot. These uses are delivered with within large warehouse buildings situated in the south-western aspect of the Site. The northern and eastern aspects of the Site are made up of a considerable amount of car parking associated with the existing retail outlets. The B&Q store stands at approximately two and a half storeys high on land elevated from street level and set back behind an area of greenspace. The greenspace to the front of the B&Q retail store is listed as an Asset of Community Value, known as Cricklewood Green.
- 2.2 The Site has a Public Transport Accessibility Level (PTAL) of 4-5, located between Cricklewood Railway Station and Cricklewood District Centre. Cricklewood Station benefits from Thameslink services to Kings Cross St Pancras in 10 minutes, Farringdon within 16 minutes and trains to Luton Airport within 35 minutes. The Site is also well served by bus services to Victoria, Hammersmith, Oxford Street, Brent Cross and Golders Green. The West London Orbital line has the potential to further increase capacity for high density development in Cricklewood.
- 2.3 The existing B&Q car park has two vehicle accesses. The first is at the south-east corner on Cricklewood Lane, in the form of a limited-movements priority junction (no right-turn out); the second is towards the north off Depot Approach.
- 2.4 The B&Q site is bound by Kara Way Playground (which is located on a corner plot at the junction of Kara Way and Depot Approach) and Champion Terrace (which appears to have originally formed part of the railway yard, now facing onto the retail and industrial park) to the north, national railway lines and Cricklewood railway station to the east, Cricklewood lane to the south and Cricklewood Broadway to the west which has been subject to change in recent years.
- 2.5 The site is located in the Brent Cross Cricklewood Growth Area which is one of the largest regeneration schemes in Europe and is designated within the Cricklewood and Brent Cross Opportunity Area which seeks to deliver 10,000 new homes (London Plan 2016). The emerging LBB Local Plan also identifies Cricklewood as a mayor growth area and indicates that the B&Q Cricklewood Site has a potential indicative capacity to accommodate approximately 1,007 new homes.
- 2.6 The London Plan recognises that the area has significant potential for wider economic development, new housing and regeneration, capitalising on public transport improvements including Thameslink and the Northern Line upgrade. In line with the Cricklewood, Brent Cross Regeneration Area Development Framework.

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- 2.7 The Site is currently heavily underutilised with adjacent site's recently subject to planning permissions for residential-led proposals – signifying a change to the character of the immediate site area.

### **Surrounding Area**

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- 2.8 The surrounding area is characterised by a mix of uses (including an industrial unit to the north and retail uses along the A5) with the Thameslink and railway line running adjacent to the Site to the east.
- 2.9 The Site is designated within the Cricklewood Regeneration and within the Brent Cross and Cricklewood Opportunity Area and is designated to deliver significant housing growth of mixed type and tenure, alongside leisure space, retail and community facilities. The wider opportunity area is currently subject to significant growth, for higher-density, residential-led proposals, including the emerging developments at the Asda site and Co-op site immediately to the west. .
- 2.10 The two sites adjacent to the western boundary of the Site have been approved for comprehensive high density residential -led mixed use development proposals. With 1-13 Cricklewood delivering 145 new homes within buildings ranging from 6-9 storeys. Further, 194-196 Cricklewood is set to deliver a 6 storey building comprising 3,457sq.m of Class A1 use and 96 new homes. There are a number of other development plots which have been identified within the Brent Cross/ Cricklewood Opportunity Area, where LBB officers have approved planning permission for comprehensive redevelopment.
- 2.11 The Site is located adjacent to the Cricklewood Town Centre, close to Primary retail frontages. The Town Centre is defined by linear retail frontages along Cricklewood Broadway and along Cricklewood Lane. Cricklewood is one of Barnet's main town centres, operating as an economic hub for small to medium sized business.
- 2.12 There are no statutory designated heritage assets on the Site, however it is recognised that heritage assets are present in the surrounding context. Three Grade II listed structures are located within a 500 metres radius of the Site, comprising Milestone Sited Outside Number 3 and 4 Gratton Terrace, Three Lamp Standards in front of the Crown Public House and the Crown Public House itself. The Cricklewood Railway Terraces immediately to north-west of the Site are designated as Conservation Area.

### **Other Key Considerations**

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#### **Flood Risk**

- 2.13 The Site is located within Flood Zone 1 (lowest probability of flooding) (with reference to the Environment Agency Flood Map; as held online). Given the size of the Site, a Flood Risk Assessment and Drainage Strategy has been prepared and is submitted in support of this application. The accompanying Flood Risk Assessment ('FRA') has assessed the Site in terms of topography,

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geology, hydrogeology and climate change, identifying the potential sources of flooding and how residual flood risk will be managed without causing flood risk elsewhere in the future. A LBB Sustainable Drainage Assessment Form will be submitted at an subsequent Reserved Matters application stage in accordance with LBB validation guidance.

### **Heritage and Conservation**

- 2.14 With regards to heritage, there are no listed buildings on Site and it is not located within a Conservation Area.
- 2.15 Within the surrounding area there are two Grade II listed buildings to the south west along Cricklewood Broadway and Yew Grove. A Heritage and Townscape Assessment has been prepared by Montague Evans and is submitted in support of the proposals (as part of the Environmental Statement). The site lies in close proximity to the Cricklewood Railway Terraces Conservation Area which is located immediately to the North of the site. This application includes an assessment as to whether the site falls within the backdrop of the existing protected London View Management Framework (LVMF) designated views.

### **Public Transport Accessibility Level ('PTAL')**

- 2.16 Access to public transport varies across the Site, as measured by TfL's Public Transport Accessibility Level (PTAL). The high PTAL rating across the site – PTAL 4-6 signifies that the Site is within a highly sustainable location. This reflects the proximity to Cricklewood Railway Station (Zone 3) and local bus routes. Cricklewood Station benefits from Thameslink services to King's Cross St Pancras in 10 minutes, Farringdon station in 16 minutes and Luton Airport in 35 minutes.

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### 3. PLANNING HISTORY

3.1 In order to fully understand the proposals and the context of the proposed development it is important to consider the planning history associated with the Site and the immediate area. LBB's online planning register highlights that the Site has been subject to a number of minor applications related to the Sites established commercial use. The most recent EIA scoping opinion submission is directly related to this outline planning application. A summary is provided below:

- 19/6632/ESC - Environmental Impact Assessment Scoping Opinion. Formal Scoping Opinion issued: 19.02.2020
- 17/6211/ADV - Non illuminated and illuminated fascia signs. Approved: 31.01.2018.
- F/03051/10 - Retention of a mezzanine floor measuring 301 sq m for the purposes of storage ancillary to the existing retail units. Approved: 06.10.2010.
- C00640BD/01 - Erection of 2m high perimeter fencing and landscaping works. Approved: 24.12.2001.
- C00640AY/00 - Externally illuminated signs and pole sign. Refused: 17.05.2000.
- C00640AX/99 - Demolition of rear extension and rebuilding, new garden centre, sprinkler tank and pump house, and conversion of retail unit to B & Q Warehouse. Approved: 07.02.2000.

#### **Neighbouring Applications & Permissions of Interest**

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##### **Brent Cross and Cricklewood- Hybrid Consent**

3.2 In December 2005, the Cricklewood, Brent Cross and West Hendon Area development Framework was adopted by LBB and the Mayor of London as supplementary planning guidance – identifying the area as having capacity to deliver a minimum of 10,000 new homes, and 20,000 new jobs.

3.3 A hybrid planning application to establish a masterplan and framework for the comprehensive regeneration of the Brent Cross Cricklewood Area in accordance with relevant development plan policies was submitted by a partnership of key landowners and developers in March 2008. This resulted in extensive pre and post application consultation with the council, the GLA, Transport for London, the Highways Agency, the Environment Agency and other agencies and stakeholders and the local community.

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- 3.4 In November 2009, the council resolved to approve the hybrid application subject to completion of a Section 106 Agreement. On 28 October 2010, the Section 106 Agreement was completed and the hybrid planning permission for the development was granted. This established a masterplan and framework for the comprehensive regeneration of the whole of the Brent Cross and Cricklewood Regeneration Area comprising residential (Use Class C2, C3 and student/ Special needs/ sheltered housing), a full range of town centre uses including Use Classes A1, B1-B8, leisure uses, rail based freight facilities, waste handling facility and treatment technology, petrol filling station, hotel and conference facilities, community, health and education facilities, private hospital, open space and public realm, landscaping and recreation facilities, new rail and bus stations, vehicular and pedestrian bridges, underground and multi-storey parking, works to the River Brent and Clitterhouse Stream and associated infrastructure, demolition and alterations of existing building structures, electricity generation stations, relocated electricity substation, free standing or building mounted wind turbines, alterations to existing railway including Cricklewood railway track and station and Brent Cross London Underground station, creation of new strategic accesses and internal road layout, at grade or underground conveyor from waste handling facility to combined heat and power plant, infrastructure and associated facilities together with any required temporary works or structures and associated utilities / services required by the development (LBB ref: C/15559/08).
- 3.5 Cricklewood has seen a significant increase in residential development in recent years. Some of the larger applications immediately adjacent to the west of the site are set out below, signifying the changing character of the area.
- 3.6 **1-13 Cricklewood (18/6353/FUL)** – Residential-led redevelopment of the site to include demolition of existing buildings and erection of three blocks ranging from 6 to 9 storeys with flexible retail (Class A1-A4 & D1) at ground and basement level and 145 residential units (Class C3) on upper floors, with associated parking, servicing arrangements, amenity space, public realm improvements and all necessary ancillary and enabling works. Approved (10.10.19).
- 3.7 The approved scheme was submitted with a Financial Viability Assessment with the applicant and LBB officers agreeing to the provision of 10% affordable housing on site, all of the units delivered under shared ownership. As stated in the applications committee report, the principle of introducing tall buildings on site is established by the Brent Cross/ Cricklewood Regeneration Area which identifies the land parcel within the Regeneration Area.
- 3.8 The proposal was considered to have no impact on local viewing corridors or locally important views which would be adversely impacted by the development. In a wider context, there are no protected views as designated by the London Views Management Framework (LVMF) which would be affected by the proposed development.
- 3.9 **194 -196 Cricklewood Broadway (17/0233/FUL)** – Redevelopment of site to provide a 6-storey building comprising 3,457sqm of Class A1 use (food store) at ground floor level and 96no. self-

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contained flats (Class C3) at first to fifth floor levels including basement car parking, cycle parking, refuse stores and a single storey car parking deck. Approved (24.01.18).

- 3.10 In terms of affordable housing, the viability assessment submitted in support of the application set out that the development could not support the provision of any affordable housing however that the applicant made an offer to provide 14.6% of the units as affordable rented units (20% discount on local market rent). The assessment was independently reviewed on behalf of the LBB, it was determined that the development could not support any affordable housing and that the offer of 14.6% was reasonable.
- 3.11 The build-to-rent development proposal with all units managed and let by the applicant. Build-to-rent schemes are supported by the GLA and LBB officers as a vital part of the housing sector which support market mobility and the principle of such a housing product in this location was considered acceptable.
- 3.12 **Brent Cross Cricklewood Regeneration Area – RM Phase 1C (18/6409/RMA)** - Reserved Matters Application was submitted by BXS Limited Partnership in October 2018, in respect of Plot 11 of Phase 1C pursuant to Conditions 1.3(i), 2.1 and 1.7 of planning permission F/04687/13 (dated 23rd July 2014) for the comprehensive mixed use redevelopment of the Brent Cross Cricklewood Area. The application seeks approval of details relating to layout, scale, appearance, access and landscaping for a residential-led mixed use development of Plot 11, comprising 352 residential units, flexible retail (Use Classes A1/A3), provision for a ground floor Neighbourhood Police Unit (Sui Generis), basement and undercroft car parking, cycle parking, refuse storage and plant to be provided within two buildings with heights ranging from 8 to 13 storeys arranged around a private courtyard, together with an eastwest publicly accessible route between the two buildings. Approved (11.04.19). The S73 permission set a baseline requirement to provide 15% of all residential floorspace as Affordable Housing with a target of up to 30%.

#### **Pentavia Retail Park**

- 3.13 Further to the above Cricklewood context, the comprehensive redevelopment of Pentavia Retail Park was recently approved under Stage 3 Call in by the Mayor of London (ref: 17/8102/FUL).
- 3.14 The scheme includes the erection of 844 residential units (including Build to Rent and traditional housing), 885 sq.m of ancillary residential floorspace; 1,028 sq.m of non-residential floorspace, within buildings ranging in height from 4 to 16 storeys. The Mayor of London resolved to approve the scheme citing the wider benefits in terms of its substantial contribution towards achieving both local and strategic targets for housing (including affordable) and optimising the development of an under-utilised brownfield site.



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- 3.15 The site is not identified by Barnet as a strategic location suitable for tall buildings (unlike B&Q Cricklewood). However, the GLA considered that the proposed height and massing of the development was acceptable in this instance, with material considerations and wider planning benefits of the proposals considered to outweigh a departure from Development Plan policies and guidance (in line with Section 38(6) of the Planning and Compensation Act 2004).
- 3.16 The GLA highlighted the wider benefits of the scheme in terms of its substantial contribution towards achieving both local and strategic targets for overall and affordable housing and optimising the development of an under-utilised brownfield site. In doing so, the GLA acknowledged that the net housing completions in Barnet have not met the relevant annual monitoring target in the London Plan, with affordable housing completions significantly below the 40% Local Plan target (21%). The GLA therefore concluded that the scheme makes a major contribution to Barnet's housing delivery which was deemed as the key material consideration for the GLA in assessing the departure from the Barnet Local Plan with regards to height.

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## 4. PROPOSED DEVELOPMENT

- 4.1 The Applicant is seeking Outline planning consent (with all matters reserved apart from access) for the comprehensive redevelopment of B&Q Cricklewood. The following section provides an overview of the development proposals and planning application approach.

### **The Planning Strategy – Outline Planning Application Approach**

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- 4.2 It is widely recognised that it is not possible to deliver a project of this scale in a single-phase development. Accordingly, an Outline application (with all matters reserved apart from access) is being pursued in order to help facilitate the development coming forward on a phased basis over time, with a series of Parameter Plans and Design Guidelines prepared to guide the nature and quality of future Reserved Matters Planning Application ('RMA's). This includes the development footprints, building plots, heights and key points of access. This approach ultimately allows a level of resilience to market change and most importantly delivery, which has been discussed and agreed with LBB officers during pre-application discussions.

### **The Illustrative Masterplan**

- 4.3 EPR have also been appointed to prepare an Illustrative Masterplan for the entire Site to ensure that it is comprehensively planned for and avoids the development coming forward in a piecemeal, non-co-ordinated manner. The key principle of the proposal is to ensure the delivery of a high-quality scheme, which responds/complements the changing character of the immediate area – at a pivotal location in the Cricklewood and Brent Cross Opportunity Area, which is subject of significant change. As such, the redevelopment of the Site will not only ensure the sustainable re-use of the Site into the future but will also contribute to the wider regeneration of the surrounding area, Barnet, and London as a whole (in accordance with Policy 2.6 of the London Plan).
- 4.4 The Illustrative Masterplan has carefully considered the relationship of the Site with its surrounding context (including future development proposals to the south-west which recently secured planning permission). The Masterplan is proposed to be delivered in three phases (Phase One, Phase Two and Phase Three) and seeks to establish a number of key, indicative development principles for the Site in terms of building layout, scale, connectivity, and access, to deliver up to 1,100 residential units and up to 1,200 sq.m GIA of commercial floorspace (within Use Classes A3, B1, D1, and D2) with associated access, landscaping car and cycle parking. The evolution of the Masterplan has been informed by dialogue with both LBB and GLA officers, alongside relevant technical inputs (as presented within the supporting application documents). The enhancement of public realm within Cricklewood and the creation of a new civic heart with a clear community focus have been key driving principles of the Masterplan design – enhancing links and connections through the site, successfully integrating it with its surroundings, including Cricklewood Green and Kara Way playground.

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4.5 Alongside the Parameter Plans and Design Guidelines Document, the Illustrative Masterplan is supported by a Masterplan Design and Access Statement – illustrating the design evolution and general principles for future RMAs. It is proposed that the outline application is made in relation to the whole Site and will seek planning permission for four distinct development parcels (Parcels A-D) as shown on the accompanying Parameter Plan (ref: 10965-EPR-XX-XX-DR-A-TP-0102) submitted for Approval. The four development parcels should be delivered in accordance with the accompanying Phasing Plan (ref: 10965-EPR-XX-XX-DR-A-TP-0105) as follows:

- Phase One – Development Parcels A and B;
- Phase Two – Development Parcels C; and
- Phase Three – Development Parcels D.

4.6 Whilst the Development Parcels are submitted for approval, the Blocks referenced above are for illustrative purposes only and provide a discussion around the quantum of development which could be secured/ accommodated.

#### Development Parcel A

4.7 Within the Illustrative Masterplan, Development Parcel A comprises blocks ranging from 6 to 25 storeys. There is capacity for 377 indicative units within the Illustrative Masterplan, comprising an indicative housing mix of 68 (18%) studio apartments, 128 (34%) 1-bedroom units, 154 (40%) 2-bedroom units and 29 (8%) 3-bedroom units.

#### Development Parcel B

4.8 Within the Illustrative Masterplan, Development Parcel B comprises blocks ranging from 5 to 12 storeys. There is capacity for 170 indicative units within the Illustrative Masterplan, comprising an indicative housing mix of 51 (30%) 1-bedroom units, 34(49%) 2-bedroom units and 35 (21%) 3-bedroom.

#### Development Parcel C

4.9 Within the Illustrative Masterplan, Development Parcel C comprises blocks ranging from 8 to 17 storeys. There is capacity for 329 indicative units within Illustrative Masterplan, comprising an indicative housing mix of 40 (12%) studio apartments, 131 (40%) 1-bedromm units, 140 (43%) 2-bedroom units, and 18 (5%) 3-bedroom units.

#### Development Parcel D

4.10 Within the Illustrative masterplan, Development Parcel D comprises blocks ranging from 3 to 16 storeys. There is capacity for 224 indicative units within the Illustrative Masterplan, comprising 40

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(18%) studio apartments, 103 (48%) 1-bedroom units, 58 (28%) 2-bedroom units and 23 (10%) 3-bedroom units.

### **The Parameter Plans**

- 4.11 A set of Parameter Plans have been prepared by EPR Architects to provide LBB with a degree of control over the form and nature of future development. The Parameter Plans have been designed to provide sufficient flexibility to adapt to market changes, but also to provide LBB with comfort over the height, scale, layout and general form of development.

#### Parameters Plan 10965 0103: Demolition Plan

- 4.12 Parameters Plan 10965 0103 'Demolition Plan' details in red, all of the existing properties within the Site boundary which are proposed for demolition as a result of the proposed development. The areas hatched in green highlight the existing surface areas to be levelled and re-landscaped along with the retention of the existing substation highlighted in blue.

- 4.13 Parameter Plan 10965 0104: Development Parcels

Parameter Plan 10965 0104 'Development Parcels' defines the four development plots within which future RMA's should be brought forward. This comprises Blocks A, B, C and D. The Development Plots Plan accounts for an enhancement / zone of tolerance area for balconies and defensible planting at ground floor level.

#### Parameter Plan 10965 0110: Development Heights

- 4.14 Parameter Plan 10965 0110: 'Development Heights' ensures that appropriate controls are in place over the future development heights secured within each of the Development Plots. This Parameter Plan has been informed by the overarching massing strategy within the Illustrative Masterplan and Masterplan Design and Access Statement. The heights established on the Parameter Plans represent the maximum extents of the building envelope of each Development Parcel ; the heights have been specified from mean street level. As noted on the Development Heights parameter plan, any proposal which exceeds the specified building heights, or to deviate from the massing envelope as shown will be subject to additional daylight sunlight analysis at RMA stage.

#### Parameter Plan 10965 0111: Phasing

- 4.15 Parameter Plan 10965 0111 'Phasing' defines the three distinct phases of development, with Development Parcels A and B coming forward in phase 1 (shown in blue), Development Parcel C in phase 2 (shown in red) and Development Parcel D coming forwards in phase 3 (shown in green). It is proposed to attach the Phasing Plan (ref:\_\_\_) to a distinct planning condition so as to allow for any alterations to phasing/timescales to be amended by way of altering that specific condition only (without impeding the wider application documents and plans).

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### Parameter Plan 10965 0105: Key Points of Access and Circulation

- 4.16 Parameter Plan 10965 0105 'Access and Circulation' defines the principle vehicular, pedestrian and routes to be brought forward as part of any future RMA. The Plan also defines the two-way service and emergency routes with turning head areas.

### **The Design Guidelines**

- 4.17 A Design Guidelines document has been prepared by EPR Architects and should be read in conjunction with the Parameter Plans (ref:\_\_\_\_\_). The Design Guidelines have been informed by discussions with Planning and Design Officers at the Council providing guidance for future RMAs which will be secured by relevant conditions.
- 4.18 The Design Guidelines provide a lasting framework for a future RMAs, ensuring that subsequent proposals meet high standards of design. The guidelines cover a number of design matters including, the site wide layout, building massing, appearance and public realm.

### **Development Proposals – Key Principles**

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#### **Development Layout**

- 4.19 The outline proposal comprises of four residential Blocks (as highlighted within the submitted Masterplan Design Document); comprising of Development Parcels A-D:
- Development Parcels A and B front onto Cricklewood Green and the new town square have the potential to provide the majority of the flexible commercial offer at ground floor level.
  - Development Parcel A is the tallest building element within the outline masterplan, providing a marker building for the new town square and Cricklewood Railway Station.
  - Development Parcel C and D are envisaged as perimeter buildings, open to the south-west for improved daylight/ sunlight. The Blocks will be predominantly residential in use, with central garden courtyards at upper podium level, providing communal amenity space for the residents of each building (details of which are reserved for future determination). Careful consideration has been given to the maximum AOD height of Building D, given its proximity to the Cricklewood Railway Terraces.

The layout of the Indicative Masterplan is framed around a series of routes through the Site including areas of public realm/open amenity space. The Development Parcels are orientated to optimise permeability and legibility through the Site – in enhancing connections to the wider area and to/from Cricklewood Train Station. For full details relating to the siting of the built form, please refer to the Masterplan Design Statement as prepared by EPR in support of this planning application.

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### **Flexible Commercial Space**

- 4.20 The Illustrative Masterplan has been designed to have capacity for the inclusion of commercial floorspace (up to 1,200sq.m). This will complement the existing mixed-use character of the surrounding local area, whilst helping to create an extended active frontage along the A5 “*key corridor of change*” – directly in line with aspirations of both the Council and the GLA, in terms of enhancing the OA. It is proposed to seek a flexible range of use classes (A3/B1/D1 and D2) for the commercial premises, in order to maximise the range of potential commercial operators that could be targeted. It is considered that the proposed commercial use complements the residential offer and is highly appropriate given the Site’s location and will greatly enhance the vibrancy of the local area.

### **Scale and Massing**

- 4.21 The proposal consists of four distinct blocks (A, B, C and D), up to a maximum AOD of +141.675 metres (Block A). This is considered pivotal in providing a feature building, marking this as a gateway location for Cricklewood Station. Building heights then taper down to the north and along the railway line. This is in accordance with feedback received from the Council during pre-application discussions.
- 4.22 Development Blocks fronting the railway have been staggered to create some articulation in the building façade and break up any perceived bulk and scale of the proposal, particularly when viewed from the Railway Terrace conservation area. The arrangement of the blocks also integrates with the adjoining sites with the urban design creating new connectivity, encouraging movement throughout the wider area. This integrates open spaces throughout the site and pedestrian access to Kara way play area, Cricklewood Station and Cricklewood Town Centre.
- 4.23 This variation in height further reduces the perceived bulk and scale of the proposals from key views as explored in the accompanying Heritage and Townscape Visual Impact Assessment (‘H&TVIA’) and Masterplan Design and Access Statement. The scheme achieves an overall density and number of units required both in terms of viability and in order to help to deliver new homes (including 35% affordable homes).

### **Indicative Housing Mix**

- 4.24 The proposed development will provide for a range of housing types comprising a mix of studios and flats. At this stage, the accommodation Schedule submitted with the outline planning application is illustrative and demonstrates an indicative mix which could be secured across the Site. The final mix will be determined with the local planning authority during detailed discussions at Reserved Matters stage.

**Table 4.1 Indicative Accommodation Schedule**

<b>Unit Type</b>	<b>Number of Units</b>	<b>Percentage Mix (%)</b>
Studio Flats	148	13%
One Bedroom Flats	413	38%
Two Bedroom Flats	434	39%
3-bedroom	105	10%
Total	1,100	100%

#### **Affordable Housing**

- 4.25 The proposal is seeking to provide 35% affordable housing, on a habitable room basis, with the majority provided in the first phase; comprising a tenure split of 70% intermediate/shared ownership units and 30% affordable rent. Within the Build to Rent element of the development, the Applicant is proposing to provide approximately 55 units (86 habitable rooms) for Discount Market Rent (DMR). The units will be provided at 80% of Market Rent to eligible households. This is discussed in further detail at Section 6 of this statement and within the accompanying Viability Statement prepared by Montagu Evans.

#### **Residential Quality**

- 4.26 The proposed homes within the Illustrative Masterplan have been designed to meet the requirements of London Plan Policy 3.8 which is consistent with part M of the Building Regulations. Policy 3.8 requires 90% of all new homes to be accessible and adaptable in accordance with Part M4(2), and 10% to be designed as 'Wheelchair user dwellings' in accordance with Part M4(3). It is envisaged that this will be controlled through the use of appropriately worded planning conditions on any future Reserved Matters approval.
- 4.27 The accommodation proposed will create a high-quality gateway into Cricklewood, providing a balanced, and diverse residential community. All the proposed homes will meet modern specifications in terms of sustainability criteria and minimum space standards. The proposal seeks to maximise the number of dual aspect homes within the development.

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### **Residential Amenity**

- 4.28 The Design Guidelines provide details regarding private amenity space provision on site, in the form of private balconies, gardens and communal amenity spaces (including the Podium Glades and Rooftops) for the respective Development Blocks. The detail regarding the proposed amenity areas for the residential accommodation will be provided in future Reserved Matters planning applications. Further details regarding residential amenity are provided in the accompanying Masterplan Design Statement.

### **Amenity Space and Child Play Space**

- 4.29 The Illustrative Masterplan and Masterplan Design Statement outline the key Landscaping Character Areas and the principles that future Reserved Matters Applications should consider. At this stage the Outline planning application seeks to ensure that each unit will have private amenity space, which complies with the London Plan and LBB standards. In addition, roof gardens and open space between the blocks will be landscaped and a new civic square established for holding events. Future development proposals will also include areas of public open space which will create new links to Kara way play area.
- 4.30 Public amenity space is illustrated at this stage through the following character areas, Arboretum Place, Wood Way, Cricklewood Lawn and Rail Side along with the future podium and roof top amenity levels. Collectively these areas will help build a sense of place and community, providing defined areas of private open space, semi communal areas and publicly accessible open spaces open to all. Further it is envisaged that future development proposals will help to enhance Cricklewood Green as a key community space within the local area. The enhancement of the existing local community asset would likely seek to increase its usability, accessibility, safety and biodiversity while retaining its character and existing uses.
- 4.31 We recognise the requirement to deliver safe access to good quality, well designed, secure and play space. The public areas throughout the scheme will be open and incorporate hard and soft landscaping, as well as child play spaces, delivering a total of 13,000sq.m of public realm and open space (45.5% of the site area). The landscaping strategy includes flexible space for community events along with playable routes through the scheme. The scheme will deliver a significant uplift in green space across the site, enhancing the relationship with Kara Way Play space, with a new community space provided adjacent to the Park.
- 4.32 The outline application seeks to make provision for 3613.74sq.m of playspace, with a large proportion of play space provided at ground floor level within the public realm. Further playspace areas are located in the podium and rooftop landscapes. This is further Illustrated on the Masterplan and the Masterplan Design and Access Statement, as prepared by EPR and Exterior Architecture.



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## Energy Strategy

- 4.33 The outline energy strategy for the proposed redevelopment will follow the London Plan's energy hierarchy approach of 'BeLean', 'Be Clean', 'Be Green'. As the application is submitted in outline thermal modelling has yet to be undertaken in detail. Guidance on the quantum of Co2 emissions reduction will be given in this outline statement and how to achieve those reductions.
- 4.34 The proposal will target an overall on-site reduction in carbon dioxide emissions in excess of the DLP minimum requirement of 35% for both residential and non-residential.
- 4.35 The development proposal makes provision for a site-wide heat network serving all parts of the development, fed by air source heat pumps, possibly an ambient loop system, subject to detailed design matters. The proposed number and location of the air source heat pump plant will be carefully designed to allow the connectivity to a future wider borough network whilst minimising distribution losses across the Site. At this outline planning stage the design parameters have included capacity for each building to be developed with its own heat pump set producing low temperature communal heat which then distributes around the site.
- 4.36 Solar Photovoltaics (PV) are likely to be the most appropriate technology to supplement the air source heat pumps and will offer direct contribution to the development's overall energy requirements. Provision of PV panels will be assessed and maximised against the other project requirements.

## Cycle and Car Parking

- 4.37 The Illustrative Masterplan has been designed to accommodate 10% residential car parking (as agreed with TfL during pre-application discussions) equating to 110 spaces for the residential units. The car parking strategy will be finalised at RMA stage based on the detailed design. At least 20% of the car parking will have electric vehicle charging points and the remainder will have passive provision for future expansion subject to future demand. Further, the Outline application makes provision for the delivery of a new Car Club space for the benefit of the new residents along with the wider local community. The Masterplan also accounts for cycle parking in line with DLP standards, equating to the delivery of 1,866 long-stay and 106 short-stay cycle spaces for residents. Cycle parking for the commercial units will also be provided in accordance with the DLP. Staff cycle parking will be provided within the commercial units as part of the commercial fit-out.

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## 5. PLANNING POLICY

5.1 This section outlines the principal planning policy considerations which have informed the evolution of these proposals and which provide the context for the consideration of this planning application.

5.2 The UK Planning System has a plan-led approach. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that:

*“If regard is to be had to the development plan for the purpose 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”.*

### **The Development Plan**

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5.3 The current Development Plan relevant to the Site consists of the following:

- The London Plan (2016) (as consolidated with all alterations since 2011);
- LBB Core Strategy Development Plan Document ('CS') (September, 2012);
- LBB Development Management Policies ('DMPD') (September, 2012);
- LBB Unitary Development Plan “13 saved policies” for Brent Cross and Cricklewood' ('UDP') (May, 2006); and

### **Other Relevant Policy Guidance**

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- The National Planning Policy Framework ('NPPF') (2019);
- National Planning Practice Guidance ('NPPG') (2019);
- Draft London Plan (Intend to Publish - 2019Plus Secretary of State directions January 2020)
- Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework (December 2005).
- London Plan Supplementary Planning Documents, including Housing SPG (2016);

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## **National Planning Policy**

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### **National Planning Policy Framework (2019)**

- 5.4 The revised National Planning Policy Framework (NPPF) was updated in February 2019, superseding the previous version published in March 2012 and, revised in July 2018, as an overarching document establishing the national planning policy agenda. The NPPF must be taken into account in the preparation of local and neighbourhood plans, and it is a material consideration when determining planning applications.

### **Sustainable Development**

- 5.5 Sustainable development is achieved using three overarching objectives – economic; social; and environmental. These three objectives are interdependent and need to be pursued in mutually supportive ways, securing net gains across each of the different objectives (Paragraph 8). At the heart of the NPPF 2019, is the presumption in favour of sustainable development. (Paragraph 11).
- 5.6 Where there is an up-to-date development plan, Paragraph 11(c) states that proposals in line with policy should be approved without delay.

### **Housing and Residential Development**

- 5.7 The NPPF seeks to support the Government's objective of significantly boosting the supply of homes, it is important that a 'sufficient amount and variety of land' can come forward as needed. (Paragraph 59).
- 5.8 In determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals (Paragraph 60).
- 5.9 Such strategic planning policies should also identify the size, type and tenure of housing needed for different groups such as affordable housing requirements, housing for families, older people, students, people with disabilities, service families, travellers, people that rent their homes, and people wishing to building the own homes (Paragraphs 61 & 62).
- 5.10 In meeting this identified need, Paragraph 73 the NPPF requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of 'five years' worth of housing land supply. An additional buffer of 5% of sites should also be provided to ensure both choice and competition in the market for land (Paragraph 73) or more in cases where there is a record of persistent 'under delivery of housing'.

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- 5.11 The NPPF also supports the provision of housing within the town centre. Paragraph 85 recognises that residential development often plays an important role in ensuring the vitality of a town centre and Councils should set out policies that encourage residential development on appropriate sites.

### **Design**

- 5.12 The NPPF notes that the creation of high-quality buildings and places, are fundamental to the planning process and should ensure that the result is sustainable development that are better places to live and work in (Paragraph 124). There is an obligation on planning authorities to clearly set out the vision and expectation for the area through planning policies (Paragraph 125).
- 5.13 Conversely, there is also an obligation for the applicant to engage with planning authorities and the community early in the process to 'clarify expectations' and 'reconcile local and commercial interests'; and applications that demonstrate early, proactive and effective engagement should be looked upon more favourably (Paragraph 128). Similarly, where a proposal accords with the clear expectations in local planning policy, design should not be used by the decision-maker as a valid reason to object to development (Paragraph 130).
- 5.14 Proposals should meet with the six design principles set out in Paragraph 127 that include improving the long-term quality of the overall area; the design, layout and landscaping result in visually attractive design; designs are sympathetic to the local characters; there is a strong sense of space that creates a welcoming environment to live, work and visit; optimal use of the site in terms of development and green and public spaces; and creating places that are inclusive, safe and accessible to the whole community in the long term.
- 5.15 In terms of design, Paragraph 131 state that when determining an application, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the general standard of design in the local area but still fit with the overall form and layout of their surroundings.

### **Environmental Considerations- climate change and the natural environment**

- 5.16 The NPPF seeks to ensure that the planning system supports a transition to a low carbon future by supporting proposals that - include a radical reduction in greenhouse gas, minimise vulnerability and improved resilience to the effects of climate change, encourage the reuse of existing resources, and support renewable and low carbon energy sources (Paragraph 148).
- 5.17 In terms of design, Paragraph 150 states that new development should manage any risks associated with climate change; and consider the location, orientation and design of a proposal. Paragraph 153 goes on to state that new development should connect to a decentralised energy supply where available, and again emphasises the need to consider landform, layout, buildings orientation, massing and landscaping in the design process.

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- 5.18 The NPPF also requires local planning authorities to conserve and enhance biodiversity when determining planning applications (Paragraph 175). New development should be appropriate for its location, with Paragraph 178 requiring new development to ensure that there is not an unacceptable risk from pollution and land instability, and where a site may be contaminated, that the developer is required to make this safe (Paragraph 179). Proposals should also be appropriate for their location in terms of the effects of the development itself such as living conditions created, light pollution, noise impacts, air quality (Paragraphs 180 & 181).

### **Heritage**

- 5.19 Paragraph 189 of the NPPF requires the significance of a heritage asset (such as a Scheduled Ancient Monument) to be considered in the context of any impact of a proposal. This impact is on the asset itself as well as the setting of the asset, and great weight is to be given to the assets conservation. Only in exceptional circumstances and where there is a clear public benefit, will proposals be accepted that are otherwise considered to have a 'substantial harm' to a heritage asset (Paragraph 195).

### **Regional Planning Policy**

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#### **London Plan (2016) (consolidated with all alterations since 2011)**

- 5.20 The proposals will be required to accord with the strategic planning policies defined within the London Plan (2016) (as consolidated with alterations since 2011).

#### **Draft London Plan (Intend to Publish - 2019)**

- 5.21 The Draft London Plan ('DLP') was published by the Mayor for consultation in December 2017, with modifications published in July 2018. The DLP has now gone through an Examination in Public ('EiP') over seen by a Panel of Inspectors appointed by the Secretary of State who issued their report and recommendations on the Draft London Plan on the 8<sup>th</sup> October 2019.
- 5.22 The Mayor issued his intention to Publish London Plan on 9th December 2019, alongside with a schedule of the panel's recommendations and the mayor's response to them. On the 13th March 2020, the Secretary of State for Housing, Communities and Local Government issued a response to the DLP , requesting this is modified in line with certain directions to meet housing requirements and maximise housing delivery.
- 5.23 Whilst the plan is not yet formally adopted, it is at an advanced stage and will likely carry material weight in the determination of this planning application. As such, the draft standards are detailed below and have been considered in evolving the proposals presented herein.

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## **Strategic Vision and Strategy –Outer London: Vision and Strategy**

- 5.24 Map 2.2 of the London Plan designates the London Borough of Barnet as falling within ‘Outer London’ Associated Policy 2.6 outlines that the Mayor will, and borough other stakeholders should, enhance the quality of life in outer London for present and future residents as one of its key contributions to London as a whole.

### **Brent Cross and Cricklewood Opportunity Area**

- 5.25 The site is designated within the Brent Cross and Cricklewood Opportunity and Regeneration Area. The Opportunity Area is recognised as a ‘significant strategic growth area’ by the GLA and LBB with the A5 Edgware Road identified as a key corridor of change for mainly residential-led mixed use development and improved public realm. Proposals in these locations should seek to optimise residential output and densities, providing necessary social and other infrastructure to sustain growth.
- 5.26 The Brent Cross and Cricklewood Opportunity Area covers an area of approximately 324 hectares of land, defined by Edgware Road in the west, and A41 Hendon Way in the east -identified by the GLA as having capacity to deliver a minimum of 9,500 new homes and 26,000 new jobs. In October 2010, a hybrid planning application was approved by LBB officers to establish a masterplan and framework for the comprehensive regeneration of the whole of the Brent Cross and Cricklewood Regeneration Area comprising residential, a full range of town centre uses, new Brent Cross Shopping centre, improvements to Brent Cross London underground station, and associated infrastructure (ref: C/1559/08).

### **London Housing Requirements**

- 5.27 The London Plan seeks to address the acute shortage of housing across the capital, through encouraging intensification of housing delivery and mixed-use development on key brownfield sites (especially surplus commercial land), particularly within identified Opportunity and Regeneration Areas – in order to deliver a minimum of 42,000 new homes per annum to 2026. The London Plan sets out an expectation for all London Boroughs to achieve, and exceed, relevant minimum borough housing targets.
- 5.28 However, it is noted that the intention to Publish London Plan 2019 seeks to further increase the overall supply of homes in London, acknowledging a need for new homes per annum over the plan period. This represents an increase of approximately 55% from the adopted London Plan minimum target of 42,000 new homes per annum (which has indeed been agreed as the required target by the Planning Inspector). With regards to LBB, the minimum ten-year housing target has been increased – setting out a minimum 10-year target of 23,640 residential dwellings for Barnet (2019/20 – 2028/29).

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## Development of Brownfield Land

5.29 Paragraph 5.95 of the London Plan states that in a city where space is increasingly at a premium, it is essential that wherever practicable, brownfield sites – including those affected by contamination should be recycled into new uses.

5.30 The DLP Policy GG2 'Making the best use of land' seeks to enable the development of brownfield land; sites which are well-connected by existing rail stations should be prioritised. Supporting text emphasises the reuse of large brownfield sites and states this remains crucial as vacant plots are now scarce. Para 1.2.5 highlights this is also relevant to site in outer boroughs of London:

*"All options for using the city's land more effectively will need to be explored as London's growth continues, including the redevelopment of brownfield sites and the intensification of existing places, including outer London"*

5.31 Policy H1 also supports housing delivery on brownfield sites, especially those with PTAL ratings of 3-6 or those located within 800m of a station or town centre boundary.

## Affordable Housing

5.32 The DLP makes clear that development proposals should seek to make the best use of land, by utilising brownfield land and optimising density, to deliver the homes Londoners' need. It makes clear that delivering the right mix of housing is a priority, setting out a strategic goal for the delivery of 50% affordable housing across London.

5.33 Developments which trigger the affordable housing requirements should provide affordable housing through the threshold approach (DLP Policy H6). The threshold level of affordable housing on gross residential development is initially set at a minimum of 35%.

5.34 DLP Policy H6 seeks the following tenure split for affordable housing on all applications:

- 30% low cost rent (Social Rent / London Rent);
- 30% intermediate products (London Living Rent / London Shared ownership – meeting the definition of genuinely affordable housing); and
- 40% to be determined by the borough as low cost rented homes or intermediate products based on the identified need.

## Build to Rent

5.35 For Build to Rent ('BtR') schemes, the Mayor expects at least 30% of Discount Market Rent ('DMR') homes to be provided at an equivalent rent to London Living Rent with the remaining 70% at a range of genuinely affordable rents. Schemes will also be required to meet all other requirements of Part C of Policy H6 threshold approach to applications.

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- 5.36 DLP Policy H11 requires Build to Rent schemes to be held under a covenant for at least 15 years with a clawback mechanism in place to ensure there is no financial incentive to break the covenant. Build to rent units must be under unified ownership and unified management of the private and Discounted market rent elements of the proposed scheme.
- 5.37 The Build to Rent Policy has been developed in recognition of the fact that Build to Rent operates a different model to Build for Sale. Build to Rent relies on income through rent over a number of years, rather than an upfront return on sales.
- 5.38 Where a developer is proposing a Build to Rent development which meets the definition within the DLP, the affordable housing offer can be entirely Discounted Market Rent (DMR). There remains a preference for DMR homes to be let at London living Rent levels.

### **Optimising Site Capacity**

- 5.39 DLP Policy D3 encourages all development to make the best use of land through a design led approach that optimises the capacity of the site, through evaluating the sites attributes, its surrounding context and its capacity for growth to determine the appropriate form of development for the site.

### **Inclusive Design**

- 5.40 DLP Policy D5 requires development proposals to achieve the highest standards of accessible and inclusive design. It is essential to consider inclusive design and the developments' contribution to the creation of inclusive neighbourhoods at the earliest stage in the development process. It should also include links to the wider neighbourhood, enhancing networks of legible, logical, safe and navigable pedestrian routes.

### **Housing Quality and Standards**

- 5.41 Housing developments are required to be of high-quality design and provide adequately sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures under DLP Policy D6. Residential proposals are also encouraged to maximise the provision of dual aspect dwellings and avoid the provision of single aspect dwellings. Further, proposals should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating minimising overshadowing and maximising the usability of outside amenity space.



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### **Accessible Housing**

- 5.42 In providing suitable housing for a diverse population, including disabled people, older people and families with young children DLP Policy H1 requires residential proposals to provide at least 10% of dwellings that meet Building Regulation requirement M4(3) 'wheelchair user dwellings', all other dwellings must meet Building Regulation M4(2) 'accessible and adaptable dwellings'.

### **Tall Buildings**

- 5.43 Tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, making a substantial contribution new homes and economic growth. Tall building also helps to optimise the capacity of suitable sites which are well connected by public transport and have good access to services and amenities. DLP Policy D9 requires proposals that include tall buildings to address the potential visual impacts through analysis of long-range views, mid-range views from the surrounding neighbourhood and immediate views from surrounding streets.

### **Increasing Efficiency**

- 5.44 Policy GG6 of the DLP refers to increasing efficiency and resilience through a requirement for all development proposals to seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero-carbon city by 2050. This Policy also requires buildings and infrastructure to be designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves.

### **Energy Infrastructure**

- 5.45 Policy SI of the DLP requires development proposals to identify the need for and suitable sites for, any necessary energy infrastructure requirements including energy centres, energy storage and upgrades to existing infrastructure. Proposal should identify existing heating and cooling networks, proposed locations for future heating and cooling and opportunities for expansion and inter-connecting existing networks as well as establishing new networks.

### **Local Planning Policy**

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- 5.46 The LBB Local Plan was adopted by the Council in July 2012 and is comprised of the Core Strategy Document and accompanying Proposals Map; along with the Development Management Policies Development Plan Document (2012).

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## **Site Specific Allocations / Designations**

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- 5.47 With regards to adopted policy the site has no specific allocation with regards to land use. However, Policy CS1 states that housing and employment growth will be specifically promoted within the west side of the Borough including Brent Cross – Cricklewood Opportunity Area (where the Site sits) for 5,510 new homes by 2026. The principle of residential-led proposals is therefore supported at the Site at a local level.

### **Policies of Relevance**

In addition to the above site-specific allocations and associated policies, there are a number of policies within LBB's Local Plan Core Strategy and Local Plan Development Management Document which are deemed relevant to this planning application. A detailed summary is provided below.

#### **LBB Core Strategy (September 2012)**

- 5.48 The LBB Core Strategy was adopted in September 2012, setting out strategic policy aims to achieve sustainable development through a spatial planning approach (in line with the NPPF). The Core Strategy sets out to achieve the vision and objectives of Barnet's Sustainable Community Strategy to address factors that make places attractive and distinctive as well as sustainable and successful

#### **Policy CS1 – Protection, Enhancement and Consolidated Growth**

- 5.49 Policy CS1 sets out Barnet's place shaping strategy, which plans to concentrate and consolidate housing and economic growth in well located areas, to create a quality environment that will have positive economic impacts on the deprived neighbourhoods that surround them. Housing and employment growth will be specifically promoted within the west side of the Borough including at Brent Cross – Cricklewood (5,510 new homes by 2026); Colindale (8,100 new homes by 2026); and Mill Hill East (2,100 new homes by 2026).

#### **CS Policy CS3 – Distribution of Growth in Meeting Housing Aspirations**

- 5.50 Policy CS3 sets out a target of 28,000 new homes to be delivered over the lifetime of the Core Strategy 2011/12 – 2025/26; within the growth areas identified at Paragraph 5.32 of this planning statement. It is noted that Barnet's Local Plan target is based on the previous London Plan (March 2016) target of 2,255 net new homes a year.

#### **CS Policy CS4 – Providing Quality Homes and Housing Choice in Barnet**

- 5.51 Policy CS4 aims to create successful communities by providing quality homes and housing choice. The policy notes homes should be built to Lifetime Home Standards, with a range of dwelling sizes and types to meet Barnet's identified need. The plan seeks to deliver a minimum of 5,500 new affordable homes by 2025/2026, seeking a borough-wide target of 40% affordable. With regards to

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affordable tenure mix, the policy aspires to provide 60% social rented and 40% intermediate. The policy also identifies on sites which are suitable for the provision of an element of affordable housing, Barnet may exceptionally accept the provision of off-site housing, or a commuted payment instead of such provision.

#### **CS Policy CS5 – Protecting and enhancing Barnet’s character to create high quality places**

- 5.52 Policy CS5 highlights that LBB will ensure that development in Barnet respects local context and creates places and buildings of high quality design which are safe and attractive whilst maximising the opportunity for community cohesion. With regard to tall buildings (defined as 8 storeys or 26 metres or more) will be appropriate within identified strategic locations including Edgware Road Corridor of Change.

#### **CS Policy CS7 – Enhancing and protecting Barnet’s open spaces**

- 5.53 CS Policy CS7 sets out to secure improvements to open spaces including provision for children’s play, sports facilities and better access arrangements, where opportunities arise, from all developments that create an additional demand for open space.

#### **CS Policy CS8 – Promoting a strong and prosperous Barnet**

- 5.54 CS Policy CS8 promotes development that positively contributes to Barnet’s local economy, though delivering new jobs and attracting new business.

#### **CS Policy CS9 – Providing safe, effective and efficient travel**

- 5.55 Policy CS9 seeks to promote the delivery of appropriate transport infrastructure to support growth and reduce the impact of travel.

#### **CS Policy CS10 – Enabling inclusive and integrated community facilities and uses**

- 5.56 Policy CS10 aims to provide sufficient community facilities for Barnet’s population, including supporting inclusive design of community facilities to ensure their efficient use and provision of multi-purpose community hubs to provide a range of services at a single accessible location.

#### **CS Policy CS12 – Making Barnet a safer place**

- 5.57 Policy CS12 sets out an objective to prevent fear of crime and anti-social behaviour through encouraging appropriate security and safety measures and requiring developers to incorporate design principles which contribute to improving security and safety in all developments.

#### **CS Policy CS13 – Ensuring the efficient use of natural resources**

- 5.58 Policy CS13 highlights the Council’s aspirations to minimise Barnet’s contribution to climate change, noting the highest environmental standards for development will be sought in order to mitigate and

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adapt to the effects of climate change, in line with Barnet's Supplementary Planning Document (SPD) on Sustainable Design and Construction, and on Green Infrastructure. The policy also identifies the Council will maximise opportunities for implementing new district wide networks for decentralised energy, together with addressing water usage and air /noise quality.

#### **CS Policy CS14 – Dealing with our waste management**

- 5.59 CS Policy CS14 encourages sustainable waste management by promoting waste prevention, reuse and recycling, in addition to requiring development to provide waste and recycling facilities to meet current and future collection practices and targets.

#### **Local Planning Policy – Other Policies of Relevance**

##### **LBB Development Management Policies (September 2012)**

- 5.60 The LBB Development Management Plan ('DMP') was adopted in September 2012, setting out LBB's detailed planning policies which support the delivery of the longer-term spatial vision and strategic play-shaping objectives set out within the Core Strategy. Notably, the DMP notes a shift in approach from the former development control process which involves seeking balanced planning decisions that support positive and sustainable development.

##### **Policy DMP01 Protecting Barnet's Character and Amenity**

- 5.61 Policy DM01 provides comprehensive policy guidance with regards to development design, identifying all development is expected to represent high quality design which contributes to climate change mitigation, together with enhancing local character and respecting the appearance, scale, mass, height and pattern of surrounding buildings, spaces and streets. The policy also requires the following:

- Promotion of active frontages, with elements of visual interest, avoiding blank walls;
- Creation of safe and secure environments to reduce opportunities for crime and to minimise the fear of crime;
- Developments should allow for adequate daylight, sunlight, privacy and outlook for adjoining and potential occupiers;
- The lighting of a scheme should not have a harmful impact on residential amenity or biodiversity;
- Retention of outdoor amenity space; and
- Including appropriate hard and soft landscaping, with regards to:

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- Appropriate layout
  - The impact on hardstanding on character
  - Achieving a suitable visual setting for the building
  - Providing an appropriate level of new habitat (including trees and shrub planting)
  - Making a positive contribution to the surrounding design, biodiversity and adequately protects existing trees and their root systems.

#### **Policy DM02 – Development Standards**

5.62 Policy DM02 outlines the national and London standards for new development in Barnet, including:

- By Design, the CABI urban design principles;
- Lifetime Homes;
- Code for Sustainable Homes (now revoked);
- BREEAM;
- Wheelchair accessibility (London Plan Policy 3.8);
- Minimum floor space (London Plan Policy 3.5);
- Outdoor amenity space (the Sustainable Design and Construction SPD);
- Secure by Design; and
- Play Space (London Plan Policy 3.6).

#### **Policy DM03 – Accessibility and Inclusive Design**

5.63 Policy DM03 sets out that development should meet the highest standards of accessible and inclusive design.

#### **Policy DM04 – Environmental Considerations for Development**

5.64 Policy DM04 states all major development is required to demonstrate compliance with the Mayor's targets for reductions in carbon dioxide emissions via an Energy Statement. The policy also promotes the use of decentralised energy; improvement of air quality; mitigation against noise pollution; and compliance with London Plan water hierarchy for run off.

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### **Policy DM05 – Tall Buildings**

- 5.65 Policy DM05 notes that tall buildings outside strategic locations identified within the CS will not be considered acceptable. Proposals for tall buildings should demonstrate an active frontage, be integrated into the existing urban fabric, have no adverse impact on Local Viewing Corridors or the skyline, not cause impact to heritage assets and their settings; and not adversely impact the local microclimate.

### **DMP Policy DM06 – Barnet’s Heritage and Conservation**

- 5.66 DMP Policy 06 outlines that archaeological remains will be protected in particular in the 19 identified Local Areas of Special Archaeological Significance and elsewhere in Barnet. Any development that may affect archaeological remains will need to demonstrate the likely impact upon the remains and the proposed mitigation to reduce that impact.

### **Policy DM08 – Ensuring a Variety of Sizes of New Homes to meet Housing Need**

- 5.67 Policy DM08 identifies the need for development in Barnet to provide, where appropriate, a mix of dwelling types and sizes to provide an appropriate choice within the Borough. Further, the policy identifies the following dwelling size priorities:
- 3 bedroom homes for social rent (highest priority);
  - 3-4 bedroom homes for intermediate affordable housing; and
  - 4 bedroom homes for market homes.

### **Policy DM10 – Affordable Housing Contributions**

- 5.68 Policy DM10 outlines that having regard to the 40% borough-wide target that 40% of new homes should be affordable, the maximum reasonable amount of affordable housing will be sought on sites capable of providing 10 or more units, subject to viability. In line with the Core Strategy the tenure mix of affordable housing will be sought is 60% social rented and 40% intermediate. To reflect the emerging affordable rented housing market and retain flexibility for developments a proportion of the 60% social rented and 40% intermediate housing. These proportions are determined on a case by case basis, reflecting the local market rents.

### **Policy DM11 – Development Principles for Barnet Town Centres**

- 5.69 Policy DM11 highlights the Council will support proposals for town centre uses on the edge of centres where they sufficient justification is proposed. The policy also notes mixed use redevelopments will be expected to provide a re-provision of employment and community uses.

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### **Policy DM14 – New and existing Employment Space**

- 5.70 Policy DM14 sets out that proposals located outside of allocated employment land is permitted where the site is no longer suitable and viable for its existing or alternative business use in the short, medium, and long term and a suitable period of marketing has been undertaken. Where this can be demonstrated, the priority for re-use will be for a mixture of small business units with residential use. Where proposals to redevelop existing employment space in town centres and edge of centre sites can demonstrate that existing uses are no longer viable and suitable then the new development will be expected to re-provide mixed use floorspace with some employment, residential and community use.

### **Policy DM16 – Biodiversity**

- 5.71 Policy DM16 identifies the Council will seek to enhance and create biodiversity on development proposals. The policy also notes development adjacent to areas within the Green Grid Framework will be required to make a contribution to enhance the Grid.

### **Policy DM17 – Travel Impact and Parking Standards**

- 5.72 Policy DM17 provides comprehensive policy guidance with regards to travel and parking in Barnet. The policy seeks to secure the safety of all road users, together with ensuring access to a range of transport modes for major development proposals, requiring the submission of a Transport Assessment and Travel Plan.
- 5.73 With regards to parking, Policy DM17 expects development to provide parking in accordance with London Plan standards. The policy notes this is exceptional for residential development, in providing maximum standards; 1.5 to 1 spaces per unit for terraced houses and flats (2 to 3 bedrooms); and 1 to less than 1 space per unit for development consisting mainly of flats (1 bedroom).

### **Emerging Local Plan**

- 5.74 LBB are also progressing with their Local Plan review which went to Regulation 18 consultation in January 2020. The plan sets out a vision for Barnet over the next 15 years (2021 -2036). The Local Plan needs to be updated to ensure that the Borough continues to grow and develop to provide a thriving place for people to live, work and visit.
- 5.75 It is important that the size and mix of homes delivered will reflect the changing demographic and economic make-up of Barnet. This Plan will seek efficient use of previously developed land and Barnet's existing housing stock. It will support opportunities for tenure diversity when it can bring development forward quicker.
- 5.76 LBB has the second highest housing requirement in England when applying the 'Standard method' approach. The standard method target would be 62,000 new homes between 2021 -2036, this is a

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significant increase in housing need compared to the DLP requirements for the borough. The delivery of new homes will mostly be in key Growth Areas of the borough such as Cricklewood. The approach to growth will seek to regenerate and develop areas of brownfield and underused land and buildings, particularly where these are located in areas of good public transport provision.

- 5.77 The emerging local plan specifically refers to the Cricklewood Growth Area, identifying that there is underused land between the Broadway and Cricklewood Station to the east, which includes Broadway Retail Park. The Site is described to have excellent public transport links from Cricklewood station and bus routes along the A5 and has considerable potential for intensification. The Site is listed within Annex 1 of the schedule of sites, with an indicative housing delivery of 1,007 units.
- 5.78 LBB will use the findings from the public consultation to inform the Regulation 19 Publication Document which is anticipated to be presented to a future meeting of the Policy and Resource Committee in Autumn 2020. Subject to further rounds of consultation and the outcome of a future Examination in Public ('EIP') including consultation on proposed main modifications, LBB are currently anticipating the adoption (Reg 26) of the new Local Plan in winter 2021.
- 5.79 Once adopted the emerging Local Plan will provide the main basis upon which future planning applications will be determined.

#### **Other Material Considerations**

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##### **LBB: Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework (December 2005)**

- 5.80 In December 2005 together with the Mayor of London Barnet adopted the Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework as Supplementary Planning Guidance. This Development Framework was produced in collaboration with the GLA, other stakeholders and the Brent Cross Cricklewood Development Partners and forms an adopted Opportunity Area Development Framework (OAPF).
- 5.81 Whilst the document does not provide specific guidance regarding land use and design principles for the Site itself, the document outlines the regeneration aspirations for the Opportunity Area and recognises that should continue to be the major focus for creation of new jobs and homes, building upon the area's strategic location and its key rail facilities.
- 5.82 This is deemed a material consideration for this application, as both LBB and the GLA have identified Cricklewood, Brent Cross and West Hendon as a major area for regeneration, and the SPG indicates how the neighbouring area is to evolve.



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**LBB: Supplementary Planning Document: Residential Design Guidance (October 2016)**

- 5.83 The SPD provides further guidance, expanding on policy with regards to the design of all residential developments in Barnet. The SPD sets out general guidelines for new residential development as well as amenity and space standards. The document provides advice on privacy and overlooking, minimum room sizes, good building layout, provision of gardens, and outdoor play space requirement.

**LBB: Supplementary Planning Document: Sustainable Design and Construction (October 2016)**

- 5.84 The SPD provides clarification on Barnet's local interpretation of sustainable development in light of national and regional policy and the context of the Three Strands Approach (Protection, Enhancement, and Growth). This SPD expands on the policy approach set out in the Core Strategy and Development Management Policies (DMP) Development Plan Documents (DPD) and the London Plan. It has been revised to focus on the essential requirements against which planning applications for all forms of development in Barnet will be assessed.

**LBB: Supplementary Planning Document: Planning Obligations (April 2013)**

- 5.85 This SPD will focus on when Planning Obligations will be required and the relationship with CIL and sets the requirements for different scales of development as well as the procedures and processes for delivering the appropriate legal agreements.

**LBB: Supplementary Planning Document: Affordable Housing (February 2007)**

- 5.86 This SPD provides advice on the Council's approach to affordable housing provision. The SPD notes the Council's aim to ensure greater flexibility between tenures, maximising housing choice on a lifelong pathway from social rented through intermediate and into owner occupation.

**GLA: Homes for Londoners: Affordable Housing and Viability Supplementary Planning Guidance (August 2017)**

- 5.87 The SPG sets out the GLA's 35% affordable housing threshold for planning applications. Applications will not be required to provide viability information, nor be subject to review mechanisms if agreed level of progress is made where they deliver 35% or more affordable housing on-site without public subsidy; are consistent with the relevant tenure split and meet all of the other relevant policy requirements and obligations.
- 5.88 Schemes which do not meet the 35% affordable housing threshold will be required to submit detailed viability information to be reviewed by the Local Planning Authority, or the Mayor. Where a LPA or the Mayor determines that a greater level of affordable housing could viably be supported, a higher level of affordable housing will be required which may exceed the 35 per cent threshold.

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**GLA: Housing Supplementary Planning Guidance (SPG) (March 2016)**

- 5.89 The SPG provides guidance on the implementation of housing policies in the London Plan (March 2016), superseding the Housing SPG from 2012. The SPG highlights Council's housing targets and reflects the government's new technical standards implemented through the Minor Alternations to the London Plan, together with providing guidance on residential and mixed-use development and the further guidance in relation to facilitating new infrastructure.

**GLA: Sustainable Design and Construction Supplementary Planning Guidance (April 2014)**

- 5.90 The SPG provides further guidance with regard to London Plan Chapter 5, policies responsible for addressing 'London's Response to Climate Change'.

**GLA: Shaping Neighbourhoods Play and Informal Recreation Supplementary Planning Guidance (September 2012)**

- 5.91 The SPG relates to the implementation of London Plan Policy 3.6 (Children and Young People's Play and Informal Recreation Facilities), through providing more detailed guidance, with regards to proposed benchmark standards, types of play space deemed appropriate and methodology for calculating play space requirements. The SPG sets a benchmark of 10sq.m of useable child playspace to be provided per child, with under fives play space provided on site as a minimum.

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## 6. ASSESSMENT OF KEY PLANNING CONSIDERATIONS

- 6.1 This section of the statement sets out the key planning considerations arising from the proposal, setting out a reasoned justification for the development in the context of the adopted planning policy framework, alongside the specifics of the Site and its surroundings.

### **Principle of Residential-led, Mixed Use Development**

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- 6.2 As outlined in Section 5, there is substantial planning policy support for the redevelopment of the Site, within the Brent Cross/ Cricklewood Opportunity Area and Brent Cross/ Cricklewood Regeneration Area, whereby optimising an underutilised brownfield land parcel adjacent to a critical transport hub should be supported.
- 6.3 The Site represents an available brownfield site where housing delivery should be optimised, making efficient use of land and surrounding infrastructure within a sustainable location. The outline development proposal aligns with the Site's designation within the Brent Cross/ Cricklewood Opportunity Area and the local and strategic aspirations for the wider Cricklewood Regeneration Area – providing a significant contribution to the local housing need as well as London as a whole through the comprehensive redevelopment of the Site.
- 6.4 The proposal is also in line with the emerging policies within LBB's emerging new Local Plan (Regulation 18 version) (2020), which identifies the B&Q Cricklewood Site as having capacity for high-density development in delivering approximately 1,007 new homes. The emerging LBB local plan refers explicitly to Cricklewood as a Growth Area, identifying underused land between the Broadway and Cricklewood Station to the east, which encompasses the Site. LBB has established that the Site has excellent public transport links from Cricklewood station and bus routes along the A5 which help to further support high-density development within this location.
- 6.5 The DLP (Intend to Publish 2019) places further emphasis on housing delivery, with the Brent Cross/ Cricklewood Opportunity Area seeking to achieve significant intensification for new housing, with the ability to deliver 9,500 new homes by 2028/2029. The Illustrative Masterplan represents a high-density development capable of making a substantial contribution to the housing delivery of the Opportunity Area.
- 6.6 The DLP Policy H1 outlines that London boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, particularly on sites with existing or planned PTALs between 3-6 or which are located within a Tube station, rail station or Town centre boundary. In this regard, the Site represents a suitable location for a high-density development which can maximise the potential housing delivery on an underutilised site.

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- 6.7 Further, this outline proposed seeks to optimise the capacity of the B&Q site, through an informed design approach which has evaluated the sites existing character and surrounding context in line with DLP Policy D3. The Site is identified as an area for comprehensive regeneration whereby tall buildings can help to manage future growth, making a substantial contribution to housing delivery. Tall buildings should be encouraged where they help to optimise the capacity of suitable sites such as B&Q Cricklewood which is well connected to public transport nodes and has excellent access to local services and amenities within Cricklewood Town Centre. The Site is identified within an area whereby the principle of tall buildings should be considered acceptable. Core Strategy Policy CS5 outlines that tall buildings would likely be appropriate in strategic locations, such as the Brent Cross/ Cricklewood Regeneration Area.
- 6.8 The proposed Outline Planning Application will help bring forward development that improves the setting of Cricklewood Railway Station, with the Site currently acting as an underutilised gap between the station and the Town Centre. The proposed design approach will positively contribute to the local townscape, adding legibility to Cricklewood Railway Station and the wider Town Centre.
- 6.9 The replacement of the existing, retail floorspace associated with the B&Q premise would facilitate the delivery of up to 1,100 residential units on an unallocated retail site in an area of high housing demand. Importantly, this would not undermine key economic sectors or sites. The proposal would instead support the vitality and viability of Cricklewood Town Centre whereby retail uses are protected. The delivery of a significant quantum of residential development will help support and increase footfall for local businesses and services in strengthening Cricklewood Town Centre. As such, it is considered that the loss of the existing Class A1 retail floorspace in the location is in accordance with the NPPF, London Plan and the LBB Local Plan.
- 6.10 The Proposed Development will help to enhance a sense of place, redefining the provision of publicly accessible open space within Cricklewood, while improving pedestrian links and legibility to/from Cricklewood Green. The Illustrative Masterplan seeks to create a new civic heart for the local community, incorporating a town square design which incorporates the creation of new pedestrian and cycle links through the Site.
- 6.11 In summary, the Site is a brownfield site that is currently underutilised and located in a highly sustainable location adjacent to Cricklewood Railway Station. Against the backdrop of the acute housing need in the London region and given the scarcity of land and suitable sites the principle of optimising residential development and mixed-use proposals on the Site is consistent with all strands of policy from the NPPF (2019) through the adopted and emerging London Plan along with LBB Development Plan and should therefore be considered favourably on this basis

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## The Demand for Housing

- 6.12 The NPPF (at paragraph 59) sets out the Government’s objective of “significantly boosting the supply of homes”. Paragraph 118 states that decisions should promote and support the development of underutilised land and buildings, especially if this would help to meet identified needs for housing. At a Regional policy level, Table 4.1 of the Draft London Plan (2019) currently sets a target of 26 new dwellings annually for the LBB over the next 10 years. In addition, the Cricklewood/ Brent Cross Opportunity Area, seeks to deliver a minimum of 10,000 new homes.
- 6.13 In meeting these targets, supporting Draft London Policy H1 states that local planning authorities should seek to optimise housing delivery on all suitable and available brownfield sites. Accordingly, redevelopment of the Site for residential-led development will greatly assist LBB in meeting its housing requirements, reducing pressures to find alternative development sites, whilst notably delivering a diverse housing mix which includes much needed family accommodation. The proposals will also make a significant contribution to LBB’s affordable housing provision, for which there is also a current demand.
- 6.14 Local Planning Policy also encourages residential development through Policy CS1 and CS2, LBB is seeking a minimum annual housing target of 5,510 new homes in Brent Cross - Cricklewood by 2026. The DLP sets a requirement of 23,640 by 2028/2019. The proposal is consistent with these policies in delivering consolidated housing growth in a well-located sustainable location, supporting the recognised need for new homes within the area.

## Build to Rent Housing (‘BTR’)

- 6.15 The Build to Rent (BTR) sector has grown substantially in the UK in recent years, with one in five households now living in private rented accommodation. Renting has become an increasingly long-term prospect for tenants, with a new generation of high-quality housing for rent being matched by delivery on the ground with many thousands of new purpose-built rented homes.
- 6.16 The inclusion of a BTR definition in the National Planning Policy Framework (NPPF) (2019) has placed this growing sector in the spotlight. It indicates that the government recognises the important role BTR is already playing in boosting housing delivery and diversifying housing types and tenures. Wishing to simplify its treatment within the planning system, the government has issued specific guidance on BTR as an update to the Planning Practice Guidance (PPG).
- 6.17 The NPPF defines BTR as purpose-built housing that is typically 100% rented. It can form part of a wider multi-tenure development comprising either flats or houses but should be on the same site and/or contiguous with the main development. BTR schemes usually offer longer tenancy agreements of three years or more and will typically be professionally managed stock in single ownership and management control. BTR homes are designed and built specifically for renting with

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the sector offering longer tenancies, excellent on-site amenities, and good access to transport. Notably, the PPG now also recognises that ‘Build to Rent homes are normally designed, constructed and managed to a high-quality standard’.

- 6.18 The government notes that the development of new BTR housing can help local authorities to meet demand for private rented housing while increasing tenant’s choice “as generally speaking tenants only have the option to rent from a small-scale landlord.” The government also notes that successful schemes will retain their tenants for longer and maximise occupancy levels as BTR investment is an income focused business model. In order to achieve this, investors will strive to provide for their tenants, and this is key reason why they want to create truly sustainable communities.
- 6.19 The BTR element of the proposal will help increase housing supply, on a large, multiple phased development site, as it can be built alongside build for sale and affordable housing. The government highlights that BTR has the potential to increase the speed of housing delivery and placemaking as the market absorption rate for the private rented sector is higher than build for sale.

#### **Commercial Floorspace**

- 6.20 As set out above, the Illustrative Masterplan includes an element of flexible commercial and community uses (within use Class A3, B1, D1, D2). The proposed uses are within a range considered to be entirely appropriate for the Site’s location, creating an engaging ground floor experience, providing new active frontages. The proposed flexibility is required at this outline planning stage with details regarding the curation of these spaces defined through subsequent reserved matters planning applications.
- 6.21 On the 21 July 2020, the Government confirmed the proposed changes to Class A, B1 and D of the Use Class Order. These will be introduced from 1 September 2020. Class E has been created which is called ‘Commercial, Business and Service’ and includes Retail (A1), Café and restaurant (A3), Financial Services (A2), Professional Service (other than health or medical services) (A2), Any Other Services appropriate to provide in a commercial business or service locality (A2), indoor sport and recreation (D2), medical or health services (mainly to visiting members of the public) (D1), crèche, day nursery or day centre (not including residential and principally to visiting members of the public) (D1), Office (B1a), Research and Development (B1b), any industrial process (which can be carried out in a residential area without detriment to amenity) (B1c).
- 6.22 The proposed mix of flexible commercial and community uses is designed to support Cricklewood High Street through a selection of complementary uses, which will not detract from the adjacent primary shopping area. The development will enhance the vitality and viability of local shops and services through the quantum of development, which will bring greater footfall into the area and the local high street.

6.23 In summary, the principle of residential-led development at the Site complies with the overriding core principles of national, regional, and local planning policy – which seeks to encourage the effective use of previously developed land, in supporting sustainable forms of development. This is specifically advocated through LBB Core Strategy Policy CS1 which prioritises the concentration and consolidation of housing and economic growth in well located areas, including Cricklewood to assist with the delivery of the Borough’s housing targets and the wider vitality of the area into the future.

**Residential Accommodation**

**Indicative Housing Mix**

6.24 This outline planning application seeks to deliver up to 1,100 new residential units across three distinctive phases – comprising a mix of housing types and sizes – including studios, one-four-bedroom flats, and family-sized houses. The table below highlights the proposed indicative residential mix across the Site, acknowledging that the final mix will be determined by LBB at reserved matters stage.

Unit Type	Number of Units	Mix
Studio Flats	143	13%
One Bedroom Flats	413	38%
Two Bedroom Flats	434	39%
3-bedroom	105	10%
Total	1,100	100%

6.42 The three phases of the development will deliver a mix of housing types, sizes, and tenures including studio apartments, one four-bedroom apartments (in line with LBB local policy requirements, which advocate that developments should provide for diverse mix of unit types and tenures). Block A will comprise 100% BtR units, with a mix of Affordable Rent, Intermediate and Private housing across the remainder of the development blocks. It is noted that the precise mix of affordable housing will be determined as each phase comes forwards at RMA stage.

6.43 Across the masterplan 3 Bed family units are shown within the 4 Blocks, within various tenure types. Notably, 3 bed units make up 8% of the BtR units in Block A, 10% of total Private Sale across the site and 8% of the affordable units within Block B.

#### Affordable Housing

6.44 This application seeks to provide 35% affordable housing (on a habitable room basis). The affordable housing will be delivered within the first two phases of the proposed development, of which 70% will be intermediate and 30% Affordable Rent. The follow table outlines the indicative affordable housing provision.

Tenure	No. of Habitable Rooms	No. of Units	% Overall	% Affordable
Private	1,752	723	65%	N/A
Intermediate	662	291	24.5%	70%
Affordable Rent	282	86	10.5%	30%
Total	2,696	1,100	100%	100%

6.45 The proposed phasing will result in the early delivery of affordable housing within the first phase. The BTR element of the proposal secures up to 55 units at Discounted Market Rent (DMR). These units will be provided at 80% of Market Rent to eligible households. Affordable Rents will be provided for approximately 86 units, charged at a maximum of 65% of Market Rents.

6.46 The level of affordable housing and tenure split has been discussed with LBB and the GLA during pre-application discussions and is considered appropriate for the Site. Notwithstanding, and on request of LBB, TT's viability consultants (Montague Evans) have prepared a viability statement to justify the departure from local policy, which seeks a requirement for 40% affordable housing on sites capable of delivering 10 or more residential units.



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## Quality of Residential Accommodation

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- 6.47 Whilst it will ultimately be determined on the submission and approval of future Reserved matters application submissions the Illustrative masterplan has been prepared in accordance with the space standards required by the London Plan; the London Housing SPG (2016); and the DCLG 'Technical Housing Standards' (2015). Further, the Illustrative Masterplan assumes that all future dwellings will be designed in accordance with the requirements of part M Building Regulations. Furthermore, single aspect units have been minimised, and generally avoided on all north facing units. At this stage it is envisaged that these requirements will be controlled by the inclusion of appropriately worded planning conditions.

## Design Approach

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- 6.48 The Illustrative masterplan design concept prepared by EPR has been developed in close consultation with LBB Planning and Design officers since the project inception. The height and massing of the buildings has been designed sensitively, whilst recognising the opportunity for taller buildings within the Brent Cross/ Cricklewood Opportunity Area. The design approach was discussed and agreed with LBB during extensive pre-application discussions, with the creation of a high-quality gateway specifically advocated at the Site, the tallest element of the development within the south east section of the site (comprising Block A).
- 6.49 The proposed tall buildings have been fully informed by specialist townscape and heritage advice from Montagu Evans, analysing the potential townscape effects on local and wider strategic views. The proposed height strategy ensures increased building heights are positioned along the railway, stepping down in scale towards the north west of the Site. Montagu Evans have concluded that there will be significant townscape benefits arising from the proposal, with no unacceptable impact on the setting or value of the heritage assets. Whilst there are heritage gains from the Proposed Development, there will also be some limited harm to the setting of surrounding heritage assets. In line with paragraph 196 of the NPPF any heritage harm has to be balanced against the public benefits of the proposal including securing the developments 'optimum viable use'. In this case, the public benefits comprise substantial upgrades in public realm (new pedestrian and cycle through routes), Green Infrastructure, affordable housing provision and a diverse mix of new housing tenure types including a significant BtR offer. These benefits should be considered to outweigh the perceived harm to the setting of adjacent heritage assets. In the event that the LPA do consider that there is harm, then it is considered that this is less than substantial (as outlined within the supporting H&TVIA) and outweighed by the overarching planning benefits of the scheme.
- 6.50 The proposed form and height of the development is therefore considered appropriate given the context of the Site within the Brent Cross/ Cricklewood Opportunity Area, close to a key transport node in Cricklewood Station and with good access to local services within Cricklewood Town Centre.

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Furthermore, the Brent Cross Regeneration Area provides further precedent for tall buildings in the wider context. The London Plan also advocates high-density development at such locations.

- 6.51 As illustrated within the submitted Masterplan Design and Access Statement, the Proposed Development will not give rise to adverse impacts on any Local Viewing Corridors. The general layout has been designed to maximise permeability, legibility and visual connection through the Site, whilst facilitating potential future development to the north (Jewson's Site). The Masterplan Design Statement and in particular the Design Guidelines in support of the outline application – provides a number of detailed guidelines that will inform the quality and form of future development phases and design quality (in line with LBB and Mayoral housing standards).
- 6.52 The incorporation of high-quality design principles further justifies the Proposed Development in this regard, with the incorporation of active frontages to create a legible identity for the development and a visual signifier for this important area of Barnet – which will go towards the holistic regeneration of the area as a whole. The provision of a significant number of through-routes and landscaping across the Site, also helps to break up the form and massing of the Proposed Development
- 6.53 Specialist Daylight and Sunlight consultants (GIA) have been central to the design process and the final Illustrative masterplan submitted to inform the outline planning application is a result of this iterative process. The Building Research Establishment ('BRE') sets out guidance for new residential developments in the 'Site layout Planning for Daylight and Sunlight – A guide practice (2011) outline that residential properties have the highest requirement for daylight and sunlight and state that "guidelines are intended for use of rooms in adjoining dwellings where light is required, including living rooms, kitchens and bedrooms".
- 6.54 The Masterplan has been fully informed by a specialist daylight and sunlight assessment undertaken by GIA. The assessment considered daylight and sunlight amenity at 21 buildings surrounding the Site and overshadowing at eight private gardens, allotments, and amenity areas.

### **Energy and Sustainability**

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- 6.55 Despite the application being outline in nature, an Energy and Sustainability Strategy has been developed for the Proposed development which seeks to demonstrate not only how the proposed development will accord with relevant GLA energy policies.
- 6.56 The Energy Strategy has been developed in accordance with the GLA's hierarchy as defined by London Plan Policy 5.2 ('Be Lean, Be Clean, Be Green'). Policy 5.9 requires development proposals to reduce potential overheating and reliance on air conditioning systems, demonstrating compliance with the London Plan cooling hierarchy.

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- 6.57 Energy and sustainability is an integral part of outline development proposal. The Proposed Development will target an overall on-site reduction in carbon dioxide emissions in excess of the Draft New London Plan minimum requirement of 35% for both residential and non-residential.
- 6.58 The proposed development will be provided with a secondary building network which will connect all apartments, commercial and other non-domestic uses, and supply heat for space heating and domestic hot water generation.
- 6.59 The proposed sustainability strategy addresses the key issues with regards to sustainable design and construction such as certification, water use, drainage, flood risk, pollution, materials, waste, ecology, transport, management, health and wellbeing, accessibility.

### **Landscaping and Public Realm**

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- 6.60 The final location and details of the landscape and public realm proposals will be subject of future Reserved Matters application submissions. However, the Masterplan has been designed with the aspiration of increasing permeability, legibility and connectivity through the Site for existing and future residents. The outline planning application therefore includes appropriate measures and controls through the Parameter Plans and Design Guidelines to ensure that appropriate public, private spaces are integrated into the future development.

### **Highways and Transport**

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- 6.61 The redevelopment of the Site provides an opportunity to rationalise the existing access arrangements. The Site currently has three vehicle accesses, one onto Cricklewood Lane (A407) and two onto Depot Approach, a private road which takes access from Cricklewood Broadway (A5). The Cricklewood Lane access is proposed to be removed, providing an opportunity for enhanced landscaping and public realm to the Cricklewood Lane Frontage. The removal of existing Cricklewood Lane access/egress would improve highway safety and provide an improved environment for pedestrian and cycle movement.
- 6.62 The movement strategy offers a highly permeable layout for pedestrians and cyclists with routes into and through the site from Cricklewood Lane and Depot Approach. Within the Site, delivery and service routes are provided along the eastern and western boundaries, thereby retaining the integrity of the pedestrian realm through the heart of the Proposed Development . Cyclists will be able to pass through the Site in a north-south (and vice versa) direction, as indicated by the diagram opposite; it is anticipated that the provision of new cycle route through the Site will connect into and enhance the existing network of cycle routes in the surrounding context.
- 6.63 Larger commercial vehicles servicing the flexible commercial spaces will use the railside road to the rear of the buildings; designed for the use of 10m rigid lorries (maximum) and refuse vehicles. Refuse

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Collection Vehicle (RCV) movements are to be limited to the streets and access points indicated on the diagram opposite. RCV movements for commercial waste collection will be limited to the same roads used by RCVs serving the residential collections. The service routes have been designed to ensure a maximum carry distance of 10m from any refuse store or presentation area.

- 6.64 Cycle parking will be provided in accordance with the Draft London Plan standards, across the site this equates to 1,866 long-stay residential spaces and 106 short stay spaces. The long-stay spaces will be provided in a range of formats including triple -tier stackers, single tier and Sheffield loop stands. In accordance with the London Cycle Design Standards a minimum of 5% of the cycle spaces will be suitable for alternative cycle types including three-wheelers, children's bikes, folding bikes etc. Long-stay cycle parking will be spread across a number of smaller cycle stores at ground floor level, disaggregated across the development blocks. The short-stay visitor spaces will be provided in the form of Sheffield loop stands within the landscaping, close to the residential areas.
- 6.65 Cycle parking for the commercial units will be provided in accordance with the Draft London Plan. Staff cycle parking will be provided within the commercial units as part of the commercial fit-out. The 16 visitor spaces will be integrated into the landscaping, close to the commercial entrances.
- 6.66 Residential car parking will be provided at a ratio of 10%. This equates to 110 spaces. All spaces will be of a size suitable for disabled drivers; however, 3% (33) will be allocated for disabled drivers from the outset with the residual 7% (77) available as standard spaces with the ability to be demarcated as parking for disabled residents in the future if demand exceeds the initial 3%. No visitor car parking will be provided for the flexible commercial uses, but a small number of operational spaces will be provided for security and maintenance purposes.
- 6.67 The outline planning application is supported by a Transport Assessment which demonstrates that the Proposed development will result in a significant reduction in vehicle movements when compared to the existing retail use of the Site. This will in itself result in an overall improvement in local highway conditions. However, the reduction in vehicle trips also provides the opportunity to serve the Proposed Development from a single vehicle access and remove the existing limited-movement access onto Cricklewood Lane. This will benefit highway safety but also provide an improved and less car-dominated environment for pedestrians and cyclists.

#### **Other technical matters**

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- 6.68 A response to all other technical matters is included within Section 7 of this statement. A copy of all technical reports and assessments are also enclosed with this planning application submission.

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## 7. SUMMARY OF SUPPORTING TECHNICAL MATERIAL

7.1 A number of Technical Assessments and surveys have been commissioned by Montreaux in support of the Proposed Development. This section provides a brief summary of each technical reports submitted in support of the outline planning application. The following technical reports are address in relevant chapters of the ES:

- Chapter 8: Air Quality;
- Chapter 9: Archaeology;
- Chapter 10: Climate Change;
- Chapter 11: Daylight, Sunlight & Overshadowing;
- Chapter 12: Ground Conditions and Contamination;
- Chapter 13: Noise & Vibration;
- Chapter 14: Socio-economics and Health;
- Chapter 15: Traffic and Transport; and
- Chapter 16: Wind Microclimate.

### **Air Quality Assessment**

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7.2 The proposed Development Site is located within an Air Quality Management Area ('AQMA') that has been designed by the Council for exposure to exceedances of annual mean objectives for nitrogen dioxide and particulate matter. The proposed development as considered the Construction and Operational phase effects in terms of Dust and local concentration of both nitrogen dioxide and particulate matter. It has been determined that the there would be no discernible effects from the construction site associated with the proposal with appropriate mitigation measures put in place.

7.3 The assessment has identified that at future receptors, the effect of impacts on local air quality are negligible for NO<sub>2</sub> and PM<sub>10</sub> concentrations. Therefore, the overall effect of the Proposed Development on local air quality is defined as not significant.

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### **Arboriculture Assessment**

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- 7.4 In support of this planning application, a tree survey and arboricultural assessment has been undertaken by AIA. The Proposed Development will require the removal of 27 trees; this includes eight trees classed as moderate quality (Category B) and 19 trees classified as low quality (Category C).
- 7.5 Tree loss on site will be mitigated through a high-quality scheme of new tree planting as outlined on the General Arrangement Plan – Ground Floor which highlights the opportunity to increase the quality, impact, diversity and resilience of local tree stock.

### **Archaeology Assessment**

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- 7.6 AECOM have been instructed to undertake an Archaeology desk-based assessment ('DBA'), setting out the baseline for the Site in identifying all know designated and non-designated heritage assets within the Site and to determine the potential for as yet unknown buried archaeological remains to be present within the Site.
- 7.7 No designated assets are located within the Site; however, the reporting has identified 23 non-designated archaeological assets within the study area, none of which lie within the Site. The non-designated assets are considered not to be impacted either indirectly through the changes to their settings or directly through the Proposed Development. The Archaeological Assessment has identified a high potential for previously unrecorded post-medieval and modern remains, a moderate potential for medieval remains and a low potential for Roman remains. There is a very low potential for remains of all other periods. The Proposed Development is considered to result in residual negligible to minor adverse residual effects, considered not significant, on two archaeological assets. There is no need for further mitigation.

### **Climate Change**

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- 7.8
- 7.9 This report has been prepared by AECOM and provides an assessment of the likely significant effects of the Proposed Development on Climate Change. Considering the impact of greenhouse gas emissions deriving from demolition, construction, and operational phases of the Proposed Development. Both the demolition/ construction and the operational phases are considered to have a minor adverse impact in the context of the ES chapter. Mitigation methods and monitoring are proposed including strategies for reducing construction waste by increasing re-use opportunities and to limit the required number of HGV trips moving waste from the Site.

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## **Ecological Appraisal**

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- 7.10 AECOM have prepared a appraisal of the key features of ecological value, informed by ecological survey's undertaken on Site. The Ecological reporting comprises a summary of the potential impacts of the Proposed Development, along with appropriate mitigation measures and relevant recommended enhancement to biodiversity as part of the Reserved Matters application.
- 7.11 The Phase 1 Habitat Survey, bat emergence survey and the desktop ecology study have provided evidence that the Sites current ecological receptors do not cause a constraint to delivery of the regeneration if appropriate mitigation set out within the appraisal is implemented.

## **Flood Risk Assessment**

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- 7.12 AECOM have undertaken a Flood Risk Assessment ('FRA') for the proposed development. The accompanying report has assessed the Site in terms of topography, geology, hydrogeology and climate change, identifying the potential sources of flooding and how residual flood risk will be managed without causing flood risk elsewhere. The Site is in Flood Zone 1 and has a low risk of fluvial/tidal flooding. The flood risk from groundwater is also assessed as low. Furthermore, the existing flood risk from surface water is assessed as low to medium, any future drainage strategy will need to be designed in accordance the LBB policy, national policy and the good practice design codes. The flood risk from surface water sewer has been assessed as low and foul water sewer is assessed as medium. The risk of flooding from reservoir is assessed as very low. The proposed outline development is fully in accordance relevant planning policies, considered sustainable and acceptable in terms of flood risk.

## **Foul Sewage and Utilities Assessment**

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- 7.13 AECOM have prepared a Foul Sewage and Utilities Assessment ('FSUA') informed by the initial existing utilities report prepared by MEP Engineer, Meinhardt UK, summarising obtained utilities records and outlining the required alteration/diversion works required. The utilities search undertaken indicate the site is well located to take advantage of the existing gas, water, electric, sewage and telecommunication services in Cricklewood Lane and Depot Approach. There are existing electric, gas, telecommunication and water connections into the site from Cricklewood Lane and Depot Approach, which may be suitable for used as part of the proposed development.
- 7.14 It has been confirmed by UKPN that offsite reinforcements are required to accommodate the proposed electrical demand of 6.6MVA. Thames water Utilities Limited have confirmed that there insufficient capacity in their water and sewerage network to serve the whole development and offsite reinforcements are required.

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- 7.15 Further assessment of existing services and consultation with statutory undertakers is required to determine diversion/redundancy works on site. Further detail on these matters will be progressed at the Reserved matters stage.

### **Ground Conditions and Contamination**

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- 7.16 This assessment has indicated that there are potential sources of ground based contamination on site, linked to historical railway sidings and a former warehouse potential contamination sources include existing made ground which is likely to have incorporated demolition materials from the historic developments on-site. Ground water across the Site has been found to be of reasonable quality. The risks identified with the assessment at the demolition and construction phase can be mitigated through the delineation and remediation of the contaminated soil hotspots identified during the historic site investigation and the commissioning of desk based assessment, prior excavation and oiling works at the Site.

### **Heritage, Townscape and Visual Impact Assessment**

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- 7.17 Montagu Evans have prepared a Heritage, Townscape and Visual Impact Assessment ('HTVIA') which considers the acceptability of introducing new tall buildings within Cricklewood Broadway considering the townscape and heritage implications. The proposal is considered to result in transformative change to the character and activities on and in the immediate environs of the Site.
- 7.18 The comprehensive approach to the redevelopment and the scale of the change means there will be some significant effects on townscape and visual receptors. The assessment defines the operational effects on townscape receptors which range from Negligible to Major Beneficial.
- 7.19 The heritage receptors are considered to not experience significant effects, due in part to the orientation of the assets, the distance between the Site and designated heritage assets and the nature of the intervening development.
- 7.20 The views analysis shows that from some viewpoint locations travelling north along the High Street, the upper elements of the Proposed Development are seen in combination with the Grade II listed Crown Public House. The visibility of the Proposed Development is considered to be transient and experienced as part of a busy urban environment. The proposals take the opportunity to enhance the characteristics of the townscape in this location, improving the relationship of the new buildings with the streetscape and the existing infrastructure and public realm.
- 7.21 The proposed tall buildings are described to mark the area as a key node of high-quality regenerative development which create a successful new landmark Site. The proposal is considered to strengthen the identity of the area as one of regeneration, signalling the Site as one of landmark quality and reinforce the wayfinding and legibility of the surrounding townscape with significant benefits to the



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same and without harm to designated heritage assets or amenity. It is our view that the proposals meet the criteria of policy DM05, London Plan policy 7.7 and all other relevant planning policies.

### **Health Impact Assessment**

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- 7.22 This assessment was undertaken by AECOM, it has identified LBB as being a healthy borough, particularly for London, performing well against the main health indicators. Health indicators relating to child obesity, smoking and violent crime rates are amongst the lowest in London. However, Childs Hill ward does not perform as well in factors such as employment and crime deprivation domains. The assessment of health impacts focuses on the details of the Proposed Development and is recognised to deliver a significant quantum of housing including affordable housing choices, providing vital supply to the LBB housing market. Importantly this will help meet lower income parts of the community. Further, the provision flexible commercial space will support job creation through employment generating floorspace.
- 7.23 At the stage where the Proposed Development is operational, appropriate design measures will ensure most potential adverse health impacts are mitigated. A potential adverse health impact could arise from the additional demand on local health services, which currently have a higher patient list size than the CCG and country's target level. However, changes to the delivery of GP services through the introduction of appointments via telephone, video consultation and online prescriptions as a result of the Covid-19 pandemic could potentially release some capacity.

### **Noise and Vibration Assessment**

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- 7.24 The assessment was undertaken AECOM and considers the likely significant effects of the proposal in terms of noise and vibration on the Site and within the surrounding area. The detailed assessment considers the noise and vibration through the demolition and construction phase of development along with effects from building services and fixed plant noise. Noise and vibration monitoring surveys were carried out in January and February 2020. The dominant noise sources in the vicinity of the Site are train movements arriving and departing from Cricklewood Station and road traffic along A5 Cricklewood Lane. Vibration during train movements was experienced along the eastern Site boundary near to the railway lines.
- 7.25 During demolition and construction phase, it has been determined that there would be residual medium-term effects when noise works take place in close proximity to receptors directly to the south of the Site. In terms of more distant receptors, residential effects of demolition and construction works are predicted to be not significant and any adverse effects limited to the short term. No residual significant effects due to demolition and construction traffic noise or vibration have been identified. No residual significant effects due to operational noise once the Proposed Development is complete and occupied have been identified.

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- 7.26 In terms of mitigation and monitoring of noise and vibration levels the assessment states that no additional measures are required at this stage. However, a further assessment may need to be undertaken by the appointed contractor prior to works commencing and once exact working methods are confirmed following a Reserved Matters application.

### **Operational Waste and Recycling Strategy**

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- 7.27 The Proposed Development will promote sustainable waste management methods for waste and recycling. The accompanying report includes a strategy which displays the prospective space requirements for recycling and waste management for both residential and commercial units and explores the segregation of mixed dry recyclables, food, and residual waste. The strategy has taken into consideration logistical challenges such as space constraints within the ground floor level to recommend a residential in-bin compacted waste and recycling management strategy for the purposes of the Outline Planning Application.

### **Surface Water Drainage Strategy**

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- 7.28 AECOM have undertaken a Surface Water Drainage Strategy ('SWDS') in respect of the outline planning application. The strategy has been prepared in accordance with good practice the LBB SuDS Proforma and other relevant policy and design standards and is based upon the scheme shown on illustrative drawings. The accompanying report provides an overview of the measures that are expected to be incorporated into the proposed development, to control and manage surface water runoff.

### **Telecommunications Impact Assessment**

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- 7.29 A telecommunications impact assessment has been undertaken by GTech Surveys Limited. The assessment considers the potential impacts to local infrastructure and radio networks due to the proximity of network Rail property and Cricklewood Station.
- 7.30 The proposal has been considered to have potential to disrupt radio network operations for Network Rail and Ericsson. The Applicant has is advised to engage with both parties to assess the magnitude of any possible effects once impact assessments have been undertaken.
- 7.31 Moving forward, this would enable both Network Rail and Ericsson to formulate any mitigation required to maintain the correct operations of their respective radio networks, whilst allowing the Proposed Development to continue without causing interference or telecommunications disruption.

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## Wind and Microclimate

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- 7.32 A Pedestrian Level Wind and Microclimate Assessment ('PLW') has been undertaken by RWDI. This assessment involves undertaking wind tunnel tests on a scale model (1:300) of the proposed B&Q Cricklewood development, through a comparison of measured wind velocity and frequency of occurrence. Full details on the technical measurement technique and approach to meteorological data are included within the accompanying report. The meteorological data for the Site indicates prevailing winds from the south-west quadrant throughout the year with secondary winds from the north-east direction which are more prevalent during the spring months.
- 7.33 It is concluded that with wind mitigation measures in place, the wind conditions on site would be improved, exceeding the comfort and safety criteria for pedestrian use. All locations on-site and off-site would therefore have negligible to moderate beneficial effects. A further assessment is expected at the Reserved Matters Stage and mitigation would need to be developed relative to that scheme as it comes forward, the broad recommendations of potential strategy are included in the accompanying assessment.

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## 8. SUMMARY AND CONCLUSION

- 8.1 This Planning Statement has been prepared on behalf of the Applicant, Montreaux Cricklewood Developments Limited, in relation to the proposed comprehensive redevelopment of B&Q Cricklewood, Cricklewood Broadway ('the Site'). The entire development proposal forms an Outline Planning Application detailed within this statement, which seeks the much-needed regeneration of a highly sustainable Site.
- 8.2 The proposed regeneration of the Site is supported at both strategic and local level in various planning policy and regeneration strategy documents. In particular, the Site forms part of a wider opportunity area, within which, high density residential-led development is supported. The development proposed seeks to significantly intensify the quantum of development introducing high density residential properties, optimising the brownfield land within an urban, edge of town centre location.
- 8.3 EPR Architects have prepared an Illustrative Masterplan to demonstrate how the Site can be realise the aspirations outlined above. As a result, an Outline Planning Application with some matters reserved is submitted to establish the core principles of the regeneration. In total the Proposed Development will deliver up to 1,100 new homes along with up to 1,200 sq.m of supporting community and commercial facilities, associated landscaping and appropriate infrastructure.
- 8.4 The Proposed Development is outline and illustrative in its nature in order to provide sufficient flexibility for the Applicant and future development partners to bring forward schemes which are driven by the current market conditions at the time of the submission of Reserved Matters planning applications. However, a number of mechanisms have been incorporated into the outline planning application in ensure control and regulation over future development proposals. These principally relate to the guiding Parameter Plans and the Design Guidelines; all of which are submitted for approval.
- 8.5 The proposals are in line with key strategic design principles of the London Plan and local policies of LBB's CS and DMP (2012) – complementing the changing character of the area and ensuring the sustainable use of the Site into the future. The Proposed Development satisfies the three aspects of sustainable development identified in the NPPF (2019) and is in accordance with relevant requirements of the development plan. Consequently, we consider that planning permission should be granted, having regard to relevant guidance and the clear planning justification for the development.