



Quod

**Bunns Lane
Car Park
Redevelopment**
Planning Statement

JANUARY 2025

Q230678

Contents

1	Introduction	1
2	Factual Background	3
3	Pre-application Engagement	6
4	Proposed Development	9
5	Planning Policy and Guidance	11
6	Planning Considerations	17
7	Scheme Benefits	33
8	Section 106 Heads of Terms	34
9	Conclusions	35

1 Introduction

- 1.1 This Planning Statement has been prepared by Quod on behalf of Bunns Lane Development Limited (hereafter referred to as “BLDL” and/or the “Applicant”) in support of proposals for the residential redevelopment of the Bunns Lane Car Park, Mill Hill Broadway (“the Site”).
- 1.2 The Site is specifically allocated for residential development in the London Borough of Barnet (“LBB”) draft Revised Local Plan. The proposals accord with the draft site allocation and meet the requirements set by national, regional and local policy to direct development to brownfield land in highly sustainable town centre locations.
- 1.3 The proposals deliver a significant range of benefits that will support the wider local community, including:
 - The proposals will secure the redevelopment of an underutilised brownfield site in accordance with the Government’s objective to promote previously developed land.
 - The provision of 130 high quality built to rent homes across a mix of studio, 1 bed, 2 bed and 3 bed units which will assist meeting local housing needs.
 - The commitment to deliver 50% affordable housing (measured as habitable rooms), of which 30% will be provided at London Living Rent and 70% at Discount Market Rent.
 - The increased resident population will assist the long-term sustainability of the town centre by supporting the local businesses and the local economy.
 - Redevelopment of a surface level car park, retaining 38 car parking spaces. The significant reduction will encourage users to travel by sustainable and/or active modes of transport and reduce reliance on the private car. Public and accessible parking is important for local community access to services and amenities in Mill Hill Broadway.
 - Improvements to the western entrance to Mill Hill Broadway Station including provision of cycle parking and pick up/drop of facilities.
 - Significant public realm improvements along Bunns Lane, including the removal of the unattractive retaining wall and the creation of a more pleasant and active street frontage.
 - High quality architectural design that responds to the Site context and acts as a landmark for the town centre and public transport interchange.
 - Significant urban greening, tree planting and high-quality landscaping.
 - Homes designed to leading Passivhaus sustainable principles.
 - The scheme achieves a 46.55% improvement in habitat units and a 918.14% increase in hedgerow units compared to the existing site conditions, which significantly exceeds the 10% Biodiversity Net Gain requirement.
 - The delivery of vibrant well managed community amenity space will provide new places for people to gather, assisting to increase the sense of community.
 - The application proposals do not prejudice the ability of Network Rail to deliver step free access to Mill Hill Broadway Station.

- 1.4 Extensive pre-application engagement with LBB planning, design and highways officers and Quality Review Panel has been undertaken, during which the design of the development has been refined and the scope of this application has been agreed. The proposals have also been subject to community consultation including two public exhibitions. Full details are set out in the Statement of Community Involvement submitted in support of the application.
- 1.5 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires development proposals to be determined in accordance with the Development Plan unless material considerations indicate otherwise. For the reasons set out in this Planning Statement, the proposals accord with the Development Plan and planning permission should be granted accordingly.
- 1.6 The rest of this Statement is structured to cover the following sections:
- **Section 2** describes the factual background to the Site and surrounding context, including relevant planning history;
 - **Section 3** explains the approach to pre-application consultation;
 - **Section 4** provides a description of the proposed development;
 - **Section 5** summarises the relevant planning policy framework applicable to the Site and application proposals;
 - **Section 6** assess the key planning considerations associated with the proposed development;
 - **Section 7** describes the Applicant's approach to planning obligations;
 - **Section 8** outlines the regenerative benefits of the proposed development; and
 - **Section 9** provides overall conclusions.

2 Factual Background

- 2.1 This section of the Statement summarises the relevant factual background applicable to the Site, including a description of the Site and its surrounding context, and an explanation of the relevant planning history.

Site and Surrounding Context

- 2.2 The Site is located within Mill Hill Town Centre, which is positioned in the west of the borough and is designated as a District town centre.
- 2.3 The Site is bound by Bunns Lane to the north and west, Mill Hill Broadway Station and the railway line to the east (with the M1 motorway beyond), and Marchant Close residential estate to the south.
- 2.4 The Site is previously developed brownfield land, comprising the Bunns Lane pay and display car park which includes 186 surface level parking spaces used in association with Mill Hill Broadway Station. Vehicular access and egress to the car park is from Bunns Lane to the south west of the Site. Pedestrian access is also obtained from Bunns Lane via a stepped access to the north of the Site.
- 2.5 The majority of the Site is formed of hardstanding, with limited areas of soft landscaping lining the western boundary with Bunns Lane and the northern tip of the Site at the Bunns Lane/The Broadway mini roundabout. The Site lies on a raised plateau above Bunns Lane with stepped access at the north and a concrete retaining wall along the Bunns Lane frontage.
- 2.6 The immediate surrounding area is largely residential in character, with commercial uses along The Broadway to the east as one approaches the town centre. The nearest existing residential properties are sited on Langley Park to the west of the Site on the opposite side of Bunns Lane.
- 2.7 The Site is located within Flood Zone 1 which indicates low risk of flooding.
- 2.8 The Site is not subject to any other Statutory Designations, and no listed buildings are located within close proximity of the Site.
- 2.9 An extract of the Site Location Plan is shown at Figure 1.

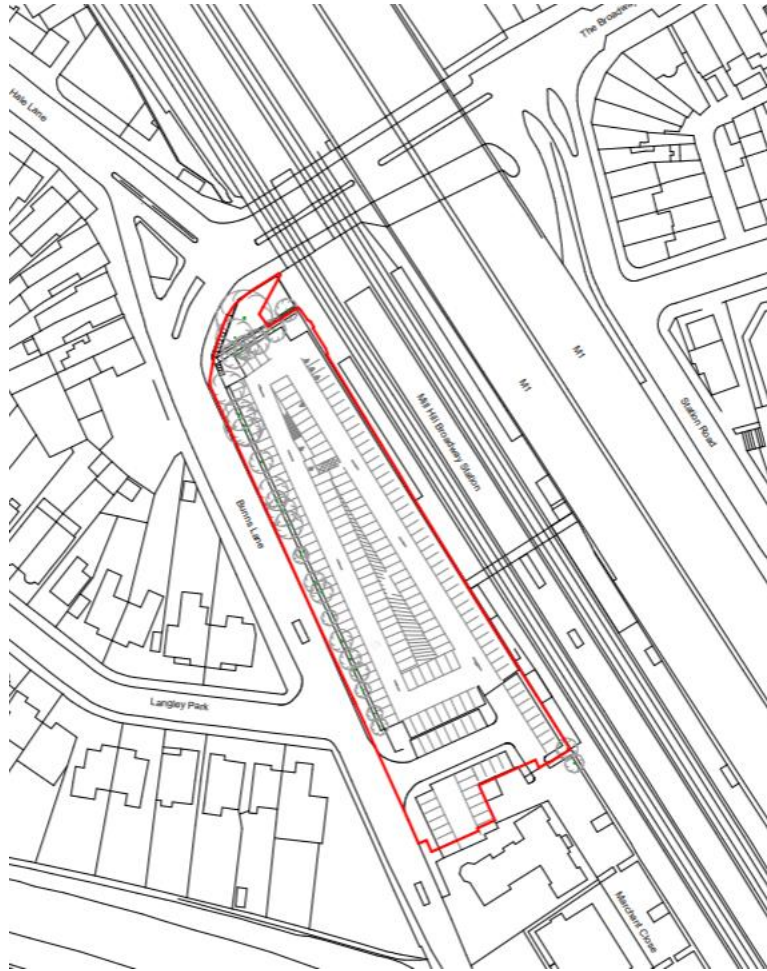


Figure 1: Site Location

- 2.10 The Site benefits from immediate proximity to Mill Hill Broadway Station which is served by Thameslink offering services every 15 minutes into central London (including London St Pancras, Farringdon and London Blackfriars), South West London and Luton/St Albans.
- 2.11 Burnt Oak and Edgware Underground stations, both on the Northern Line, are within a 10-minute bus journey from the Site. Several bus routes run through the centre of Mill Hill, with the bus station located to the east of the Site beneath the M1 motorway bridge – c.100m from the Site. The Site has a public transport accessibility level (PTAL) rating of 4, where 1 represents the least accessible locations and 6 the most accessible.
- 2.12 Mill Hill Town Centre is focused along The Broadway (A5100) to the east of the Site and is approximately a 2-minute walk. The town centre is home to a range of retail and commercial uses at ground level, many with residential properties above.

Planning History

- 2.13 A review has been undertaken of the Council’s online planning records which confirms that the Site has a very limited planning history.
- 2.14 There is no planning history of significance on the Site. In 2007 an application for residential development was granted on adjoining land to the south at Marchant Close. The officer’s report

referred to the site's close proximity to public transport services and amenities within Mill Hill Town Centre as key factors in approving the scheme.

Summary

2.15 The Site is comprised of brownfield land currently used as surface level car parking. The Site benefits from being sustainably located within Mill Hill Town Centre, close to direct links to public transport and various amenities and services.

3 Pre-application Engagement

- 3.1 The application proposals are submitted following an extensive period of consultation with LBB officers, the local community and other key stakeholders.
- 3.2 A Statement of Community Involvement has been submitted with the application which sets out the full extent of the community consultation undertaken and the Design and Access Statement explains the design evolution of the scheme as a result of the engagement process.
- 3.3 A summary of the consultation activity is provided below.

Pre-application Meetings

- 3.4 A programme of formal pre-application meetings with the project team and LBB planning officers was undertaken between May and December 2024. In total 5 formal pre-application meetings were held, in addition to ad hoc discussions/meetings with officers.
- 3.5 The pre-application meeting covered a series of topics including:
 - the principle of the development;
 - the scope of the planning application;
 - the acceptability and quantum of the proposed land uses;
 - car parking provision including the scale of any replacement public parking;
 - the scale and massing of buildings;
 - architectural treatment and materiality;
 - housing mix; and
 - private amenity space and children's play space.
- 3.6 In addition, to assist design development, dialogue has been ongoing with a number of key stakeholders including:
 - LBB highways department – A number of discussions have taken place with highways officers during which the principle of the transport arrangements and parking proposals have been agreed, along with the scope of the Transport Assessment and Travel Plan;
 - Network Rail (NR) – Several meetings have been held with Network Rail to discuss strategic matters relevant to the Site, including planned step free access improvements to the station, building separation distances, maintenance access requirements cycle parking provision and station pick up/drop off;
 - Councillor Briefings – Briefing sessions have been held with local Councillors, including the council leader and deputy leader, at which the proposed development has been presented and feedback obtained;
 - Metropolitan Police – A meeting was held with Designing Out Crime Officers to discuss the crime prevention measures to be incorporated into the proposals.

Community Involvement

- 3.7 Public Exhibitions were held in July and November 2024 to share the emerging proposals to the local community. These were public drop-in events, advertised in the press and the local area. Invitations were also sent to local business, community groups and neighbouring properties.
- 3.8 Attendees were given the opportunity to ask questions about the emerging proposals and to provide feedback, both verbally and through the completion of the questionnaire. All attendees at the consultation events were encouraged to complete the questionnaire, with some taking the survey away to complete at a later date.
- 3.9 Some of the key themes which have emerged throughout the feedback include:
- The massing and design of the building
 - Landscaping
 - Step-free access
 - Loss of car parking and traffic
 - Existing public transport infrastructure

Independent Design Review

- 3.10 The proposals have been interrogated by an independent Design Review Panel, organised by 'Frame Projects'. Comprising 5 experts drawn from across the planning and design sectors, this impartial Panel ensures design issues are discussed at the early stages of the planning process and tests the fundamental design principles of planning proposals to ensure exemplary, high-quality developments.
- 3.11 The design review took place in November 2024. Panel members undertook a site visit, alongside LBB planning officers and the project team, before reviewing a presentation of the emerging design proposals and providing their initial observations. Following this, a full written report was issued providing feedback and their advice on the development.
- 3.12 Feedback covered all elements of the proposals including:
- form, height and massing;
 - layout and plan;
 - pedestrian and vehicular access and parking;
 - landscaping and public realm;
 - elevational treatment; and
 - materials and detailing.
- 3.13 Overall, the panel were highly supportive of the proposals, stating as follows:

“The panel thinks that the proposals have the potential to deliver a high-quality development, [..]. It considers the proposed heights appropriate to the location. [..] The architecture is dynamic and appropriate to the location, with high quality detailing, that promises to deliver a landmark building.”

Summary

- 3.14 Overall, the pre-application engagement undertaken by the Applicant has been an invaluable way of gathering information and feedback from stakeholders and the local community.
- 3.15 All feedback has been carefully reviewed by the project team and incorporated into the proposals where possible and considered appropriate. The evolution of the design has therefore been shaped accordingly by this process which is explained in full in the Design & Access Statement and Statement of Community Involvement (SCI).

4 Proposed Development

4.1 The development proposals have evolved following a thorough analysis of the Site and surrounding area, and as discussed in Section 3, have benefited from extensive engagement with LBB officers, the local community and other key stakeholders.

4.2 This section summarises the key elements of the proposals, with full design details provided within the Design and Access Statement which accompanies the application.

4.3 The application seeks full planning permission for the following:

Redevelopment of the existing car park and site re-levelling for the erection of a new Class C3 residential development with amenity space, car parking, cycle parking, landscaping, alterations to existing vehicular and pedestrian access, and other associated works.

4.4 The proposed development comprises the following key elements:

- 130 new build to rent residential homes (Class C3). Residential homes sizes include 1, 2 and 3 bed flats. 50% of homes are affordable (measured as habitable rooms), of which 30% will be provided at London Living Rent and 70% at Discount Market Rent.
- Build to Rent homes are supported by well-managed, high quality shared indoor and outdoors amenity space which provide places for people to gather, fostering a sense of community.
- The building comprise of 3 linked blocks, with storey height ranging from 6 to 4 storeys.
- 51% of units are provided with an oversized balcony in excess of London Plan minimum space requirements and 49% are provided with Juliet balconies for access to private amenity, and in total meeting overall amenity provision.
- 10% of homes are wheelchair accessible and 90% adaptable accessible homes.
- High quality design reflecting and complementing the character of the local area.
- Landmark building at Mill Hill Broadway Station.
- Increased areas of landscaping and communal roof terraces offering 759m² of shared outdoor amenity space.
- Areas of play for 0-4 years provided on Site and developer contribution to play provision in the local area for other age groups which will likely be provided at Lyndhurst Park approximately 100m from the Site.
- Improved access and entrance to Mill Hill Broadway Station, with drop off/pick up spaces for station use and cycle parking.
- Reprovision of 38 parking spaces, 30 of which are publicly accessible including 6 disabled parking spaces and 4 drop off bays and 10 spaces for private residential use, 4 of which are blue bay. 2 of the existing public parking spaces will be retained.
- 201 cycle parking spaces, 5% of which are accessible.
- 8 public cycle parking spaces provided at the station western entrance.

- Significant improvement in urban greening, tree planting and biodiversity.

5 Planning Policy and Guidance

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications are determined in accordance with the development plan unless material considerations indicate otherwise.
- 5.2 The Development Plan applicable to the Site comprises the following documents:
- The London Plan (2021); and
 - Barnet Local Plan comprising the Core Strategy (2012) and Barnet Development Management Policies (2012) (including Policy Maps (2006)).
- 5.3 However, Barnet’s emerging Revised Local Plan, Policy Map and evidence base (Regulation 24) is nearing adoption with the Inspectors report issued on 7 November 2024 concluding that the duty to cooperate has been met, and subject to the recommended Main Modifications, is legally compliant, sound and in general conformity with the London Plan.
- 5.4 We understand LBB propose to formally adopt the Revised Local Plan in February 2025.
- 5.5 As such, this Statement has treated the Revised Local Plan as part of the ‘development plan’ for the purposes of assessing the proposed development. Unless otherwise stated, when referring to the local policies we refer to those in the Revised Local Plan, and therefore unless specifically stated references to compliance with the Local Plan means compliance with both the current Local Plan and Revised Local Plan.
- 5.6 Material considerations relevant to the application proposals include the National Planning Policy Framework (NPPF), supported by Planning Practice Guidance (PPG), as well as Supplementary Planning Documents prepared by LBB and the GLA.

Development Plan

The London Plan (2021)

- 5.7 Mill Hill is defined as a District Town Centre. Policy GG1 is concerned with building strong and inclusive communities and states that those involved in planning and development must *“promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for building relationships during the daytime, evening and night time”*.
- 5.8 Policy GG2 endeavours to create sustainable places that make the best of use of land, by promoting development of brownfield land particularly on sustainable well-connected sites. This includes *“surplus public sector land and sites within and on the edge of town centres.”*
- 5.9 Policy GG4 requires the creation of a housing market that works better for all Londoners. Priorities include ensuring more homes are delivered, and the creation of mixed and inclusive communities with good quality homes that meet high standards.

- 5.10 Policy GG6 sets out to make London a more efficient and resilient city by improving energy efficiency towards becoming a zero-carbon city by 2050, being adaptable to changing climate and creating safe and secure environments.
- 5.11 In respect of town centres, Policy SD6 requires that they are promoted and enhanced through identifying locations for housing-led intensification to optimise residential growth potential and delivering sustainable access to a competitive range of services and activities by walking, cycling and public transport. Furthermore, development is required to make the best use of land, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport, as well as promote vibrant daytime, evening and night-time activities.
- 5.12 Policy SD7 requires Boroughs to take a town centre first approach and discourages out-of-centre development by ensuring diversity to town centres. In particular, sites suitable for higher density residential intensification should be identified, including surface car parks.
- 5.13 Policy D2 sets out that the density of development proposals should be linked to the provision of future planned levels of infrastructure rather than existing levels and be proportionate to the site's connectivity and accessibility.
- 5.14 Optimisation of sites is a key priority of the London Plan and Policy D3 sets out that development must make the best use of land by following a design-led approach that optimises the capacity of sites as well as enhancing local context and responding to existing character. Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.
- 5.15 Development proposals should make use of the design review process to assess and inform design options early in the planning process (Policy D4).
- 5.16 Policy D5 expects development proposals to achieve the highest standards of accessible and inclusive design by accounting for London's diverse population, providing people focused spaces that facilitate social interaction and inclusion and being convenient and welcoming with no barriers to be safe and dignified for all users.
- 5.17 With regard to housing quality and standards, Policy D6 sets out a number of design standards which residential developments must meet. This includes internal space standards, private outdoor amenity space and provision of sufficient daylight/sunlight. Policy D7 requires at least 10% of homes to meet Building Regulations requirement M4(3) 'wheelchair users dwellings' and all other dwellings to be M4(2) 'accessible and adaptable dwellings' compliant.
- 5.18 Policy D11 requires development to be designed to maintain a safe and secure environment and reduce the fear of crime by utilising measures to design out crime.
- 5.19 Fire safety is a priority of Policy D12 and requires all development proposals to achieve the highest standard of safety and ensuring all major development proposals with a Fire Statement and independent fire strategy.

- 5.20 Policy D14 requires development to manage and mitigate noise to improve health and quality of life.
- 5.21 Policy H1 seeks to “*optimise the potential for housing delivery on all suitable and available brownfield sites*”. This includes sites with existing or planned public transport access levels (PTALs) 3-6 and mixed-use redevelopment of car parks and low-density retail parks and supermarkets.
- 5.22 In respect of affordable housing, Policy H4 states that developments are expected to provide affordable housing that is equivalent to 35% of the units, or 50% where the development is on public sector land.
- 5.23 Policy H10 requires residential schemes to consist of a range of unit sizes and deliver an appropriate mix having regard to local evidence.
- 5.24 Policy G1 sets out that development proposals should incorporate appropriate elements of green infrastructure that are integrated into London’s wider green infrastructure network. Similarly, Policy G5 requires development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
- 5.25 Policy SI1 seeks opportunities to deliver improvements to air quality by ensuring development proposals are at least ‘Air Quality Neutral’; utilise design solutions to prevent and minimise exposure to air pollution; and make provisions to address local problems of air quality. Policy SI2 sets out to minimise greenhouse gas emissions by requiring all major develops to be net-zero carbon and include a minimum reduction of at least 35% beyond Building Regulations.
- 5.26 In respect of sustainable drainage, Policy SI13 requires development proposals to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features and the avoidance of impermeable surfacing. Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.
- 5.27 Healthy streets are a key policy focus and Policy T2 states that proposals should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling, reduce the dominance of vehicles and connect to public transport networks. Linked to this priority, Policy T5 seeks to remove barriers to cycling and create a healthy environment in which people choose to cycle by improvements to cycle infrastructure and routes as well as securing appropriate levels of cycle parking in line with prescribed standards.
- 5.28 Policy T6 sets out that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport. Table 10.3 sets out the maximum residential parking standards and identifies that in outer London areas of PTAL 4, proposals should have a maximum of up to 0.5-0.75 spaces per dwelling. Similarly, the starting point for retail and leisure uses should be car free, save for disabled parking.

Barnet's Revised Local Plan and Policy Map (Regulation 24) 2024

5.29 The Policy Map identifies that the Site is subject to the following designations:

- Within Mill Hill District Centre; and
- Site Proposals: allocated land for development as set out in Annex 1 – Schedule of Proposals.

5.30 Annex 1 of the Revised Local Plan Allocates the Site (Site 33) for residential-led mixed use development. The Plan sets out an indicative residential capacity for 43 dwellings. It highlights that the Site is highly accessible by public transport and is located adjacent to the shops and services of Mill Hill Broadway. It further acknowledges that any development must fully assess and mitigate the air and noise pollution caused by the proximity to the raised motorway and mainline railway. Proposals are required to take into account existing residential areas to the west and south, including concern over potential overspill car parking. The design must ensure active frontages facing on to Bunns Lane. Public car parking provision should also be assessed and provided as needed.

5.31 Policy BSS01 of the Revised Local Plan aims to deliver a minimum of 46,000 new homes between 2021 and 2036. To effectively utilise urban land and mitigate climate impacts, growth is to be concentrated in Barnet's Growth Areas, Opportunity Areas, and District Town Centres.

5.32 Policy GSS01 addresses sustainable growth, focusing on economic development, new public transport infrastructure, and housing needs. The policy states that new homes are to be focussed in specific locations, which includes 5,400 homes in District Town Centres.

5.33 GSS12 supports the redevelopment of surface-level public car parks for residential and other town centre uses, provided that developments ensure adequate amenity and safety for occupants and pedestrians.

5.34 Policy CDH02 outlines requirements for sustainable and inclusive design, encouraging development proposals to achieve a BREEAM 'very good' rating or higher.

5.35 Development must also provide accessible housing in accordance with London Plan Policy D7, ensuring at least 10% of units meet Building Regulation requirement M4(3) for wheelchair users, with all other units conforming to M4(2) for accessibility.

5.36 Policy CDH03 emphasises the integration of public realm into development designs to enhance connections between public spaces and the built environment. The policy also calls for using the Secured by Design Resilient Design Tool in developments where large crowds may gather, incorporating measures for safety and security proportionate to risks.

5.37 Policy CDH07 focuses on amenity space and landscaping, mandating developments to meet minimum outdoor amenity space requirements and provide play spaces as per London Plan Policy S4. It also calls for the inclusion of wildlife habitats and tree planting to enhance biodiversity.

5.38 Policy TOW02 promotes development principles that ensure the vibrancy of town centres while accommodating evolving demands. The Council expects a diverse mix of uses in town centres

to support their vitality, encouraging varied unit sizes and maintaining street frontages for convenient access.

- 5.39 Policy CHW02 focuses on creating healthy environments and enhancing residents' wellbeing, particularly in the wake of COVID-19. The Council is dedicated to developing safe, accessible, and sustainable spaces that promote physical and mental health while addressing health inequalities. The policy requires that developments actively support these goals by integrating features that encourage physical activity and improve accessibility.
- 5.40 Policy ECC06 reinforces the Council's commitment to enhancing and creating biodiversity in development proposals, requiring a holistic approach to integrating Biodiversity Net Gain (BNG), the Urban Greening Factor, and Sustainable Drainage Systems (SuDS) for maximizing benefits to communities and nature.
- 5.41 Policy TRC02 aims for sustainable and active travel, promoting a transport network that supports a growing, healthy population while reducing car dependency and enhancing air quality.
- 5.42 Policy HOU02 specifies dwelling size priorities, with a focus on 3-bedroom homes as the highest priority, followed by 2 and 4-bedroom homes. However, for build to rent schemes paragraph 5.5.4A notes it distinct economies, identifying that demand is typically much greater for one and two beds than in other tenures.
- 5.43 Policy CDH01 stresses the need for residential developments to maximise land efficiency and achieve optimal density through a design-led approach. New developments must reflect high standards of architectural quality, adhering to the National Model Design Code and Sustainable Design and Development Guidance SPD while respecting the distinctive local character. The policy further emphasises enhancing street safety, public amenities, and promoting active travel to improve health and quality of life for residents.
- 5.44 Policy TRC03 stipulates that the Council expects developments to comply with draft London Plan parking standards, specifying maximums for residential developments based on bedroom count.

Material Considerations

NPPF & PPG

- 5.45 The National Planning Policy Framework (NPPF) (2024) sets out the Government's planning policies for England and how these are expected to be applied.
- 5.46 Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development. For decision-making, this means approving development proposals that accord with an up-to-date development plan without delay.
- 5.47 Section 5 of the NPPF relates to delivering a sufficient supply of homes. Paragraph 61 states:

"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 where it is needed,

that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”

- 5.48 Section 7 of the NPPF supports the diversification of uses across town centres, and specifically the opportunities for residential development which is able to benefit from access to services and facilities, and sustainable modes of travel.
- 5.49 Paragraph 124 of the NPPF encourages the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed land.

Summary

- 5.50 In summary, Mill Hill is designated as a District Town Centre which is to be the focus for new development. The policy framework requires the delivery of residential homes within District Town Centres to meet identified need and diversify the mix of uses.
- 5.51 The optimisation of development densities is required in town centre locations. The Revised Local Plan specifically allocates the Site for residential redevelopment, accepting the loss and reprovision of existing surface level car parking.
- 5.52 There are a range of policy and guidance related to other technical matters including transport, flood risk, design, ecology, and energy and sustainability. All of which are discussed in detail in the planning considerations section that follows.
- 5.53 The proposals accord with the requirements set by national, regional, and local policy as set out in detail in the Planning Considerations section that follows.

6 Planning Considerations

- 6.1 This section of the Statement provides an assessment of the proposals against the key policies of the Development Plan, having regard to relevant material considerations.
- 6.2 In light of the planning policy background set out above, the following planning considerations are considered relevant to the proposed development:
- **Principle of Development** - the overall acceptability of the proposed residential led redevelopment;
 - **Housing** - the residential component of the proposed development and affordable housing delivery;
 - **Design** - the appropriateness of the proposed development in terms of design and its impact on the surrounding area;
 - **Transport** - the impact of the proposed development on transport and highways, both on site and the wider network;
 - **Other Technical Matters** – including flood risk, sustainability & energy, air quality, contamination, ecology, noise, fire safety and archaeology;
- 6.3 Each of the above is considered in turn below.

Principle of Development

Loss of Car Parking

- 6.4 The Site is currently used as a pay and display car park, providing 186 public car parking spaces, 184 of which fall within the red line boundary. The proposals will result in the re-provision of 38 and retention of 2 public spaces, with the remainder being lost. This reduction is supported by national, regional and local planning policies which all seek to reduce reliance on the private car and promote modal shift to sustainable modes of transport.
- 6.5 London Plan Policy T1 requires boroughs to support the delivery of the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. Similarly, Policy TRC01 of the Revised Local Plan sets out that the Council will *“work to deliver a more sustainable transport network that supports a growing healthy population and prosperous economy by reducing car dependency, encouraging sustainable modes of transport...and encouraging active travel as the mode with the least environmental impact and health benefits for residents.”*
- 6.6 Building on these strategic priorities, the London Plan takes a strong town centres first approach in order to make the most of the agglomeration benefits and accessibility of town centres and to ensure sustainable patterns of development. Within this context, Policy SD7 requires boroughs to: *“identify sites suitable for higher density mixed-use residential intensification capitalising on the availability of services within walking and cycling distance and current and future public transport provision including...car parks”.*

- 6.7 The Revised Local Plan follows this strategic direction by allocating specific town centre sites for development (see Annex 1), including Site 33 – ‘Bunns Lane Car Park’. According to the details contained within Annex 1, the Site is within a *“highly accessible location”* and requires development to mitigate against noise and air pollution from the adjacent railway line and M1 Motorway. The proposals re-provide 38 and retain 2 of the existing 186 spaces, which is circa 22% of the existing provision. This is further supported by survey evidence (described and presented in the Transport Assessment) and feedback in the public consultation, where many residents felt that the car park is often utilised by individuals from outside the local area and commuters, as well as pick up/drop off associated with the station.
- 6.8 The allocation is consistent with Policy GSS12 which seeks the redevelopment of certain public car parks. The policy notes that to ensure the efficient and sustainable use of land the Council will *“consider positively proposals which optimise use and capacity through the re-development of parking spaces in suitable sites within publicly accessible surface level car parks for residential and other suitable main town centre uses”*. Criteria C requires that details are submitted to demonstrate the suitability and arrangements for any retained parking. There is therefore a clear expectation that the existing levels of parking will be reduced to enable redevelopment of the Site.
- 6.9 Similarly, revised Policy TRC03 states that the Council will expect development to *“limit car and motorcycle parking”* and specifically requires that car parking should *“not be re-provided at previous levels”*. Indeed, Criteria I requires a proportionate approach to the scale and type of development proposed, including the assessment of appropriate car parking provision levels and consideration of capacity for on-street parking.
- 6.10 In light of the above, the policy expectation is clear that allocated public car parks (such as the Site) will be redeveloped for residential uses and as a result there will be reduction in car parking levels. As such, the principle of the reduction in car parking spaces on the Site is acceptable given the Site’s PTAL score and availability to other methods to access the station. The assessment of the scale of public car parking to be reprovided and confirmation of no negative impacts on street parking, nor any anticipated increase in those driving rather than using the train to commute to work are detailed in the Transport Assessment and addressed in the transport section below.

Residential Development

- 6.11 The application proposes the comprehensive redevelopment of a town centre site to deliver a residential scheme comprising car parking and landscaping.
- 6.12 The presumption in favour of sustainable development is central to the NPPF. It advocates that the planning system should do everything it can to support sustainable growth and requires planning policies take a positive approach to the growth, management and adaptation of town centres (paragraph 90). It seeks to ensure that the vitality of town centres is protected and enhanced through development. Furthermore, the NPPF reinforces the Government’s objective of significantly boosting the supply of homes (paragraph 61) and to ensure that a sufficient amount and variety of land can come forward where it is needed to accommodate these new homes.

- 6.13 The London Plan strongly promotes the vitality and viability of town centres through the delivery of residential development to diversify uses and specifically designates Mill Hill as a District Centre with 'high' residential growth potential.
- 6.14 The Revised Local Plan seeks to focus new development in District Town Centres and Mill Hill is specifically identified as a priority for growth, "*investment and revitalisation*". Revised Local Plan Policy GSS08 identifies that District Town Centres are expected to deliver at least 5,100 new homes between 2021 and 2036 with "*provision for uplift through the design-led approach*". In order to deliver these new homes and infrastructure, it is identified that the Council will support proposals that "*optimise residential density within the context of the town centre...whilst delivering improvements to the amenity of the area and overall offer of the town centre*".
- 6.15 The Site is allocated for residential development within the Revised Local Plan which establishes the principle of development on the Site. This is consistent with national and regional policy which supports residential development in highly sustainable town centre locations, close to transport nodes such as a railway station.
- 6.16 In light of the above, the policy framework strongly supports the development of the Site in principle, alongside the reduction in existing public car parking.

Housing

Housing Mix

- 6.17 The development provides 130 Build to Rent new homes which will make a significant contribution to meeting the borough's housing targets and identified need. The Revised Local Plan acknowledges that investment in residential led mixed use development will help to fund public realm and infrastructure improvements making District Town Centres such as Mill Hill more attractive places to live, visit and enjoy.
- 6.18 The Revised Local Plan identifies the need for the District Town Centres to provide 5,100 new homes with 4,319 to be delivered within the first 10 years of the plan period.
- 6.19 The Revised Local Plan recognises that in order to deliver mixed and inclusive neighbourhoods, LBB will support proposals which provide a mix of dwelling types and sizes to help meet current and future housing needs. Proposals should provide an appropriate range of dwelling sizes and types, taking account of the housing requirements of different groups to address housing need.
- 6.20 The Revised Local Plan is based on up-to-date evidence and identifies that whilst 3-bedroom properties are the highest priority, market sale homes with 2 and 4 bedrooms are also a medium priority. It is however noted that this should not be interpreted as implying that there is not a need for a full range of unit sizes. A mix and choice of housing delivery is essential to complement the existing housing stock and support the diverse population of Barnet.
- 6.21 The application development proposes the unit mix detailed at Table 2.

Table 2: Proposed Housing Mix

Type	Number	%
1 Bed/1 person	39	30
1 Bed/2 person	42	32
2 Bed	40	31
3 Bed	9	7
Total	130	100

- 6.22 It is noted that the proposed mix provides more 1 bed homes and slightly more 2 beds than the Council’s preferred mix, as well as less 3 beds.
- 6.23 Policy HOU02 allows a variation to the preferred mix on a site-specific basis and notes that in applying the dwelling size priorities the Council will consider site size; surrounding context, including town centre location; PTAL; character; mix of uses; and range of tenures ensuring site optimisation that is consistent with London Plan policies H1, H4 H5 and H10.
- 6.24 The provision of apartments of predominantly 1 and 2 bedrooms is considered entirely appropriate given the specific circumstances of the Site. This includes its sustainable location in the Town Centre, in close proximity to local services and public transport connections. The policy framework makes it clear that within these types of locations higher density developments should be promoted, and delivering smaller homes enables the efficient use of land and optimisation of site capacity.
- 6.25 The proposed Build to Rent accommodation seeks to meet a specific housing need which is more desirable to young professionals and individuals/couples where there is a reduced requirement for larger family units. The characteristics of the Site in terms of its size constraints and surrounding uses also make it better suited to apartments than houses.
- 6.26 The applicant has worked with specialist advisors to inform the unit mix of the private Build to Rent homes. They have advised that local agents consider the rental market locally to have high levels of demand for smaller units and that there are higher proportions of single occupiers in rental homes in the market area compared to outer London.
- 6.27 There are few rental homes available on the open market and of those that are there is a very limited availability of 1 bed 1 person units – there is widening gap between the need for homes for one and two person homes. Without supply of good quality professionally managed smaller homes within the market rental sector, including studios, there will be increasing pressure on the existing larger housing stock to be either sub divided or used by sharers which will diminish the larger homes for families. The conversion, subdivision and sharing of larger family homes is not generally the most preferred solution to meeting these needs and the delivery of bespoke designed smaller homes would much better meet these requirements and support the wider objectives of the area.

- 6.28 There is policy support for increasing the delivery of Build to Rent homes – including in the Revised Local Plan. The supply of 130 new homes for rent will be a very significant and meaningful boost to housing locally adding diversity and choice which is not currently available.
- 6.29 Overall, the unit mix of the scheme is guided by Policy HOU02 having regard to the size of the site (its classified as a small site and therefore is more constrained than some Build to Rent schemes), surrounding context (including its town centre location), its PTAL, its character including its situation adjacent to the railway line, the availability of homes locally comparative to needs, market evidence and the importance of optimising site delivery.
- 6.30 Within the supporting policy text to Policy HOU02 there is recognition that affordability is an important factor and whilst the aspiration is for family-sized homes, these are often unaffordable. One and two bedroom homes are a more affordable option and allow younger, single people and young couples access housing in areas that may not have otherwise been possible.
- 6.31 Furthermore, supporting text at para 5.5.4A specifically recognises the need for a different approach to residential mix in build to rent schemes, as they have a requirement for a greater proportion of smaller units, by way of example the Council approved a 100% studio scheme adjacent to Woodside Underground station (application reference 19/4293/FUL).
- 6.32 In light of the above, the proposed unit mix is considered to be entirely appropriate. Further details of the private and affordable housing mix is set out in the supporting Affordable Housing Statement.

Affordable Housing

- 6.33 London Plan Policy H4 and H5 and Revised Local Plan HOU01 seek to provide affordable housing within new developments, unless the provision of such housing would lead to the development becoming unviable, and therefore undeliverable. Affordable housing includes social rented, affordable rented and intermediate housing provided to specified eligible households whose needs are not met by the market.
- 6.34 As per London Plan Policy H4 and H5 and Revised Local Plan Policy HOU01, 50% of the development will be delivered as affordable housing given that the Site is Council owned land.
- 6.35 The affordable provision will be delivered as Discounted Market Rent, with 30% of the affordable housing provision delivered as discounted London Living Rent and 70% to be provided on an income cap range where rents will not exceed more than 28% of gross household income.
- 6.36 Therefore, the proposed development is fully compliant with both Revised Local Plan and London Plan policy requirements in terms of affordable housing delivery.

Inclusive Design

- 6.37 The NPPF requires developments to be safe, inclusive and accessible. Barnet's Revised Local Plan Policy DM03 requires development proposals to meet the highest standards of accessibility and inclusive design, whilst policy DM02 sets out further specific considerations. All units should have 10% wheelchair home compliance, as per London Plan Policy D7.

- 6.38 The accommodation incorporates a range of measures to ensure inclusive design is achieved. This includes step free access, suitably sized circulation spaces, and lift access to all floors. In addition, 10% of the residential units will conform to M4(3) standards for wheelchair users, and all remaining units will meet M4(2) standards meaning they are wheelchair accessible and adaptable.
- 6.39 A high-quality built environment, including delivering housing in support of the needs of occupiers and the community is part of the 'sustainable development' imperative of the NPPF. Both the London Plan and Barnet's Revised Local Plan advocate residential quality and identify that there are a variety of indicators of high-quality living accommodation including layout, orientation and form, outside space, usability and ongoing maintenance. The quality of the residential accommodation proposed is considered below within this context.

Internal Standards

- 6.40 Housing standards are set out within London Policy D6 and Barnet's adopted Sustainable Design and Construction SPD (2016), and the former provides a minimum gross internal floor area for different types of dwelling. All of the proposed new homes meet or exceed the minimum standards in relation to the unit sizes, and also meet or exceed the minimum areas for bedrooms, bathrooms, storage and utility rooms.
- 6.41 In respect of orientation, the layout of the buildings has been carefully designed to maximise dual aspect units. This has resulted in 31.5% (41) dual aspect units and 68.5% (89) single aspect homes. The single aspect units include 14 homes with enhanced aspect for example a second aspect window at 45 degree or 90 degrees to the primary aspect. This provides additional outlook for properties but does not fulfil the definition outlined in the Housing design standard LPG. This is the result of the linear nature of the Site and proximity to railway line.
- 6.42 Apartments that are single aspect, and these are provided with large windows, Juliet balconies and high ceilings to optimise light into the accommodation.

Amenity

- 6.43 London Plan Policy D6 states that where there are no higher local standards in the borough, a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant. In addition, a minimum depth and width of 1.5m applies to amenity in the form of balconies. The Revised Local Plan seeks to follow the London Plan requirements.
- 6.44 The supporting text to Revised Policy CDH07 states that all dwellings should have level access to one or more of the following forms of private outside spaces: a garden, terrace, roof garden, courtyard garden or balcony and that private outside space should be practical in terms of its shape and utility, to ensure the space offers good amenity.
- 6.45 The London Plan Policy requires 728sqm of amenity space to be provided site wide. The application proposals make a total provision of 759sqm in the form of both private and communal amenity space.
- 6.46 The provision of amenity space has been carefully considered to ensure that the needs of future residents are met. 51% of dwellings benefit from private amenity space in the form of

balconies that exceed the minimum standards of the London Plan. Balconies provided are 7sqm exceeding London Plan requirement. The remaining dwellings benefit from Juliet balconies offering fresh air and increased outlook to units. The additional Juliet balconies improve resident's aspect, level of natural light and ventilation.

- 6.47 Shared private communal amenity space is provided in the form of fourth floor communal terraces and 53sqm Home Zone area. All residents have access to all communal areas of outdoor space across the scheme. Areas of landscaping and communal roof terraces are provided for residents to gain access to outdoor space and promote a sense of community.
- 6.48 The proposals also include six areas of indoor communal amenity space totalling 270sqm. These are provided in addition to the outdoor amenity space. These are provided in the form of residential lobbies, playroom, garden rooms and flexible amenity space. These could be utilised for home working space, activities and socialising, promoting wellbeing for residents and creating a successful community.

Playspace

- 6.49 Policy S4 of the London Plan seeks to ensure that development proposals incorporate good-quality, accessible play provision for all ages. At least 10sqm of suitable playspace should be provided per child. Policy CDH07 of the Revised Local Plan states that development proposals should provide play spaces in accordance with the London Plan and Mayor's SPG.
- 6.50 Using the GLA's population yield calculator, the total number of children expected to occupy the development will be 47. The development would therefore need to provide 474sqm of children's play space. In line with GLA guidance, the development provides 100% of required provision on Site of play elements catering for children aged 0-4, equalling 252 sqm. This will be distributed across the residents' amenity areas, as well as incorporated into the public realm.
- 6.51 The Site is located within a short 100m walk from Lyndhurst Park, an area of open green space with play facilities for 7–13-year-olds, offering great access for children to play and outdoor space. This promotes health and wellbeing for children within the development. The Applicant is committed to the making the provision for playspace for children aged 5-11 and 12+ years will be met by an off-site contribution.

Secure by Design

- 6.52 Revised Local Plan Policy DM01 requires that the principles set out in the national Police initiative, 'Secure by Design' should be considered in development proposals.
- 6.53 The proposed development has been subject to pre-application consultation with the Metropolitan Police who have raised no objection to the proposals, subject to a number of recommendations that have been incorporated into the proposals eg. lighting and CCTV.

Daylight, Sunlight and Overshadowing

- 6.54 NPPF 129 c) promotes the importance of making efficient use of land and, in this context, expects local planning authorities to:

“...take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).”

- 6.55 The Revised Local Plan promotes higher densities in town centres like Mill Hill, aligning with the GLA’s Housing SPG’s guidance on flexibility in daylight and sunlight standards to support growth. It also suggests that optimising site potential may require variations from national sunlight and daylight guidance to align with local context and residential typologies.
- 6.56 LBB’s Sustainable Design and Construction SPD defines habitable rooms and outlines the importance of daylight and sunlight for quality of life and energy efficiency, also reinforcing that the BRE guidelines are not rigid rules but should be adapted to specific site contexts.
- 6.57 Therefore, planning policy at national, regional, and local levels supports a flexible application of BRE guidelines on daylight and sunlight, recognising the need for higher densities and regeneration in sustainable town centre locations such as the Site.
- 6.58 XCO2 have undertaken daylight, sunlight, overshadowing and solar panel testing in relation to the proposals in accordance with the BRE Guidelines. The Assessments test the potential effects of the development on the amenity of the relevant neighbouring receptors, as well as assessing whether the new residential dwellings will offer adequate daylight and sunlight amenity for the enjoyment of future occupants.
- 6.59 The daylight, sunlight and overshadowing analysis indicates that there will not be a notable impact on surrounding properties arising from the proposed development.
- 6.60 The onsite assessment indicates that the habitable rooms of the proposed development will achieve good levels of daylight and sunlight. As a whole, the development is anticipated to achieve good levels of daylight to all dwellings and habitable spaces and optimum sunlight in all living spaces. Therefore, providing future occupants with good quality of accommodation in terms of daylight and sunlight.

Summary

- 6.61 All of the above factors demonstrate the high-quality housing to be delivered. The proposed housing mix is entirely appropriate for this town centre location and the build to rent product, and will make a significant contribution to meeting the borough’s housing need as well as delivering policy compliant affordable housing. The accommodation is inclusively designed, adheres to Secure by Design principles as well as internal space standards, and incorporates well designed amenity and playspace and will also make a contribution to off-site improvements in the area. The proposals have also been carefully designed to respect the neighbouring properties, whilst acknowledging that some effects are unavoidable if the Site is to be optimised in accordance with strategic policy requirements.

Design

Design Principles

- 6.62 The design of the scheme has evolved in response to feedback from LB Barnet, the local community and stakeholders, as well as from an independent design review. Further details in

respect of how the scheme has been adapted during the pre-application engagement process are contained within the Design and Access Statement.

- 6.63 Through the work undertaken to date, a number of design principles have been established in order to create a scheme that delivers the optimum benefits including placemaking and high-quality homes.

Layout

- 6.64 The proposed layout has been developed in collaboration with LBB planning and design officers and seeks to provide a strong active frontage on Bunns Lane in-keeping with the existing residential character. The layout of the buildings is focussed on set backs from the railway line and maximising active residential frontages on Bunns Lane.

Form and Massing

- 6.65 Both the London Plan and Revised Local Plan require site capacity to be optimised within town centres in order to increase housing delivery in these accessible locations.
- 6.66 The massing strategy employs step-backs and varied rooflines, to reduce the perceived height and bulk of the buildings. The proposed massing is predominantly 6 storeys tall, with 4 storey linking shoulders that present to Bunns Lane and minimise the impact of the perceived height of the proposal. A single storey set back on the north end reduces the height of the scheme as viewed from Hale Lane. This approach ensures that the development does not overwhelm the existing streetscape and provides a more human scale at street level.
- 6.67 The western façade onto Bunns Lane is considered the primary elevation as this will be the most visible for pedestrians walking along Bunns Lane. Four storey shoulder elements all feature entrances in a cohesive design language into the 3 cores of the building. These entrances are designed to be bright and inviting spaces with an active frontage onto the street. Ground floor brick balconies/terraces and front garden areas are designed to create an active frontage and inviting development that reflects the character of the surrounding traditional residential buildings.
- 6.68 The eastern façade facing Mill Hill Broadway station and the railway line features the continued 4 storey white brick plinths and brick details. These breakdown the overall form of the building and creates an interesting streetscape and landmark building at Mill Hill Broadway Station.
- 6.69 The buildings are articulated with setbacks, recessed balconies, and varied facade treatments that create a rhythm along Bunns Lane and the railway frontage. This articulation succeeds in breaking down the scale of the development and contributes positively to the overall townscape, aligning with LBB policy aspirations for the area, which recognise the Site's role as a gateway to Mill Hill Broadway Station.

Character and Materiality

- 6.70 The architectural character and materiality of the development are inspired by the local context of Mill Hill, with a focus on integrating contemporary design elements that respect the area's traditional brick-built heritage. The development reflects an art deco architecture approach inspired by mansion apartment blocks in the area. The Site sits within a varied context of new

build and Victorian buildings alongside pre and postwar housing with a mix of pitched and flat roofs in the area.

- 6.71 The Broadway, an important commercial centre and transport interchange in Mill Hill, has a strong historic character. It has a number of neatly detailed brick buildings from the late Victorian and Arts and Craft movements with decorative detailing and striking features. Details such as brick quoins, projected brick panels, and decorative piers/columns form a varied but cohesive character to the area. Other features include feature corner bays and curved projecting bays. These details are a rich source of inspiration for the proposal. Materiality, Tone, Colour Brick is extensively present, with red tones contrasted by darker tones of brown brick or cream stone or render. Common decorative detailing gives individual character to each building.
- 6.72 Contrasting elements, such as green balconies, windows and doors, panelling and railings, provide additional visual interest and help to define building entrances and key architectural features. The development also incorporates large windows and green panels to enhance visual impact and add a dynamic quality to the facades. The building incorporates curved edges and balconies to create visual interest and soften the form. This combination of traditional materials with contemporary detailing creates a cohesive architectural language that ties the new buildings into the existing urban fabric while providing a fresh, modern aesthetic.
- 6.73 Retaining and improving the landscaping at the northern tip of the Site on Hale Lane, creates an inviting and high-quality view of the Site.
- 6.74 The development proposals incorporate communal roof terraces and garden rooms. A home zone area with undercroft play and adjacent amenity room offers area for kids to play in bad weather. The Play facilities are within the gated area of the Site and overlooked by the amenity room and management office promoting natural surveillance and a safe and secure area for children to play.

Privacy, Outlook & Overlooking

- 6.75 There are no national, regional or local planning policies that set out required minimum separation distances between residential buildings. With regard to other guidance documents, Barnet's Residential Design Guidance SPD states that "in new residential development there should be a minimum distance of about 21 metres between properties with facing windows to habitable rooms to avoid overlooking...shorter distances may be acceptable between new build properties where there are material justifications."
- 6.76 The GLA Housing SPG however notes that "in the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18 – 21m between facing homes (between habitable room and habitable room as opposed to between balconies or terraces or between habitable rooms and balconies/terraces)...adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city, and can unnecessarily restrict density."
- 6.77 The GLA's Housing Design Standards (2023) is the most up to date guidance and states that "The orientation and massing of buildings, and the separation distances between them, should ensure that the public realm is not unduly overshadowed to the detriment of health, wellbeing,

biodiversity or amenity”. The Optimising Site Capacity: A Design-Led Approach LPG (2023) doesn’t include any specific guidance on separation distances.

- 6.78 Due to the existing character of Bunns Lane, there is minimal residential frontage facing onto the Site. The gable end of properties on Langley Park face onto the development, where the separation of Bunns Lane in between them acts to reduce onlooking. The minimum distance between the Development and gable ends on Langley Park is 24m. Similarly, residential properties in Marchant Close will look onto the Development, however 25m separation distance allowing for the access to the development, station and parking all act to minimise the impact on the adjacent flatted development.
- 6.79 In light of the above, it is clear that the proposals have been sensitively designed to ensure that there is an acceptable relationship with neighbouring properties, and that there will not be detrimental impacts in terms of privacy outlook and overlooking.
- 6.80 The proposed redevelopment aims to transform an existing brownfield car park into a vibrant sustainable community. The buildings have been sensitively designed to respect and integrate into their surroundings whilst also ensuring that Site capacity is optimised in line with policy requirements. The high-quality design successfully balances the introduction of contemporary architecture with respect for the local heritage and townscape, contributing positively to the urban environment while supporting Barnet’s broader regeneration goals.

Transport

- 6.81 As outlined previously, a core principle of the NPPF, as well as Development Plan policy is to promote sustainable transport and to make the fullest possible use of public transport, walking and cycling. In particular, developments should give priority to pedestrian and cycle movements and have access to high quality public transport facilities. Developments should also create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians; incorporate facilities for charging plug-in and other ultra-low emission vehicles.
- 6.82 London Plan and Revised Local Plan policies note that developments should not exacerbate existing transport problems or make conditions more hazardous for highway users, all development proposals should comply with current highway design and parking standards, and accessibility to public transport should be taken into account. Additionally, facilities for both cyclists and pedestrians should be improved.
- 6.83 The transport strategy for the scheme has been considered in detail and has benefitted from detailed input from the LBB highways team, the local community and businesses, as well as the transport consultants who form part of the project team.
- 6.84 A Transport Assessment and Site-wide Travel Plan that takes into account a wide range of transport considerations including access, servicing, car parking and cycle parking have been prepared and submitted alongside this application. The key conclusions are considered below.

Access

- 6.85 The development follows the principles of the Mayor's Transport Strategy, promoting good access to public transport, walking, and cycling, in line with local and national policies emphasising sustainable and inclusive urban mobility.
- 6.86 The proposed development benefits from a Public Transport Accessibility Level (PTAL) score of 4, indicating good access to public transport options. The Site is adjacent to Mill Hill Broadway Station in travel zone 4 and is served by Thameslink providing services every 15 minutes. Burnt Oak and Edgware Underground stations are within a 10 minute bus journey from the Site and the Site located adjacent to bus facilities at Mill Hill station.
- 6.87 The Site's location within the town centre provides excellent access to a wide range of amenities within walking and cycling distance, promoting active travel and contributing to a vibrant, accessible community space as required by Development Plan policies.
- 6.88 The Site is currently accessed from the southwestern corner from Bunns Lane. The proposed development retains the existing access arrangements. The access will also be utilised for the re-provided public parking, southern entrance to Mill Hill Broadway Station and drop off/pick up.
- 6.89 The main access point for residents of the new residential buildings is located off Bunns Lane, and the residential building to the south is accessed from the new public square. These locations have been carefully considered to provide clear and welcoming entrances.

Servicing and Delivery

- 6.90 Servicing and delivery operations have been designed in coordination with LBB highways officers to ensure there are no detrimental impacts on the highway network.

Car Parking

- 6.91 All tiers of policy strongly support reducing reliance on cars and promoting active travel modes. Furthermore, both adopted and emerging Local Plan Policies GSS12 and London Plan Policy SD7 promote the redevelopment of surface level car parks.
- 6.92 The existing car park currently comprises 186 public car parking spaces and this is proposed to be reduced to 38 spaces with 2 retained. 10 of which will be provided for the residential accommodation, with 4 delivered as blue badge parking and 6 will be allocated to the 3-bed units. It has been agreed to re-provide 20 public car parking spaces from the existing, along with 4 drop-off bays and 6 Blue Badge public car parking spaces. This reflects local and national policy to promote modal shift from the private car.
- 6.93 The re-provision of circa 22% of car parking on Site reflects the Site Allocation in Annex 1 of the Revised Local Plan, where the Council only required a quarter of parking to reprovided given the sustainable location of the Site and policy shift away from private car use. Public and accessible parking is important for local community access to services and amenities in Mill Hill Broadway. This is reflective of the public consultation feedback.

- 6.94 The proposals include the retention of 2 existing PV charging facilities in the public car park and all 10 new resident parking spaces will have active EV charging.
- 6.95 The application proposals still support parking provision for local trips to the shops and deters those who travel from further afield and utilise the car park for commuting. There is an existing Controlled Parking Zone (CPZ) in the area that restricts parking between 11am-12pm which prevents the day commuter using the streets immediately surrounding the Site for parking. Therefore, the loss of parking will not as a result lead to increased parking on local streets.

Cycle parking

- 6.96 London Plan Policy T5 includes specific standards for cycling in order to help achieve the Mayor's target of 80% of all trips within London by 2041 to be made by foot, cycle or public transport. The minimum cycle parking standards applicable to the proposed development are outlined in the Transport Assessment.
- 6.97 The scheme provides a total of 201 spaces including 6 visitor short stay cycle parking spaces. A mix of Sheffield and two-tier stands are proposed, and cycle stores are easily accessible, secure, and enjoy natural light in all locations. The cycle parking is in full compliance with London Plan Standards.
- 6.98 An additional 8 public cycle parking spaces are provided at the Mill Hill Broadway Station western entrance.
- 6.99 The proposed development at Bunns Lane is in an excellent location, with extensive public transport links, pedestrian connectivity and active travel provisions supporting car-free or low-car lifestyles. The Transport Assessment and Travel Plan evidence that the proposals align with all local and national planning policies aimed at enhancing sustainable transport options, reducing car dependency, and fostering accessible, vibrant urban environments. This approach aligns with the borough's objectives to reduce car dependency, encourage the use of sustainable transport modes, and support the Mayor's Transport Strategy target for 80% of trips in London to be made by sustainable means by 2041.

Other Technical Matters

Energy and Sustainability

- 6.100 The NPPF advocates sustainable development, including mitigating and adapting to climate change and moving to a low carbon economy. The Revised Local Plan states that the Council supports the Mayor's goal for London to become zero carbon by 2050, as outlined in the London Plan. This objective is central to the Council's commitment to an environmentally sustainable Borough and resilience to climate change. The approach includes increasing energy efficiency and using low carbon energy sources throughout the development process, from design to operation. An integrated strategy aims to achieve sustainable growth while improving air quality, adapting to climate change, enhancing green infrastructure, and promoting active travel.
- 6.101 Energy & Sustainability Statements have been prepared by XCO2 and outlines the key features and strategies adopted by the design team to reduce energy use and carbon emissions for the scheme, as well as promote sustainable design principles.

- 6.102 The proposed development consists of new-build dwellings, under Part L1A 2021 of the Building Regulations. They mandate that the design of the building demonstrably causes lower carbon dioxide (CO₂) emissions than a notional equivalent of given specifications. The Assessment concludes that the proposed development will exceed the London Plan target of a 35% improvement over Part L1A 2021 of the Building Regulations.
- 6.103 The development is taking a fabric-first approach to carbon emission reductions, and has been designed using Passivhaus principles to reduce energy demand prior to the implementation of low and zero carbon technologies. Beyond the fabric performance alone, improvements beyond compliance are further being sought for the detailed design of the air tightness strategy and thermal bridging, solar panels are proposed on all available and unshaded roofspace, and the development is being served by highly efficient Exhaust Air Heat Pumps (EAHPs), providing all heating and hot water to apartments, with electric panel heaters acting as back-up only, and with waste water heat recovery further being specified to the largest apartments to ensure a low carbon hot water supply even at times of high localised demand.
- 6.104 This is achieved through passive design measures such as the delivery of improved building fabric specification exceeding that of the notional building, low air permeability target, and providing a balanced proportion of solid wall to glazing to ensure optimum daylight and reduce excessive solar gains, as well as delivering a bespoke selection of thermally broken lintels and cavity closers to assist with improving thermal bridging.
- 6.105 Active design measures utilised include Exhaust Air Heat Pumps (EAHP), PV panels and biodiverse roofs. The reports demonstrate the development exceeds the London Plan targets (2021), as well as the adopted London Borough of Barnet Local Plan, and the Revised Local Plan.

Air Quality

- 6.106 All tiers of planning policy and guidance seek to ensure that development doesn't cause detrimental impacts on air quality, both in terms of existing and future sensitive receptors. An Air Quality Assessment has therefore been prepared that considers the impacts of the proposed development on local air quality in terms of dust and particulate matter emissions during construction, and emissions from road traffic generated by the completed and occupied development; the air quality conditions that future residents will experience; and whether or not the proposed development is air quality neutral.
- 6.107 The assessment demonstrates that the proposed development is consistent with Paragraph 199 and 200 of the NPPF, being appropriate for its location both in terms of its effects on the current and future local air quality environment and the air quality conditions for future residents.
- 6.108 Proposals are also consistent with adopted and Revised Local Plan Policy DM04 as they will not contribute to poor air quality. Compliance with Policy SI 1 of the London Plan is also achieved as the development will not lead to further deterioration of existing poor air quality; will not cause or extend any exceedances of legal air quality limits; will not create unacceptable risk of high levels exposure to poor air quality; design solutions have been used to address air quality issues rather than post-design mitigation, including design measures to minimise exposure; and it is better than air quality neutral.

Noise

- 6.109 Revised Local Plan Policy CDH04 requires new developments must address air and noise quality through relevant assessments, in line with local sustainability guidelines, and Policy D13 requires developments to reduce, manage and mitigate noise to improve healthy of quality of life.
- 6.110 An MVHR system will be used to provide background ventilation to all dwellings. The results of the assessment show that typical thermal double glazing will provide adequate control of intrusive noise to all habitable rooms, with some exceptions where an enhanced performance is required due to noise from the railway lines and the M1 motorway.
- 6.111 When windows are open to mitigate overheating, the internal noise limits in Part O will be exceeded in all bedrooms, and in all living rooms except those on the west elevation. A preliminary assessment against Part O of Building Regulations has been completed, and apartments will be able to meet requirements for overheating risk mitigation by openable windows first and foremost, but that the exhaust air heat pumps will be capable of running in reverse mode, providing an element of cooling to apartments, should residents prefer to close windows and utilise this option instead (e.g. for noise reasons, as the Site has been identified as exceeding noise limits overnight).
- 6.112 The design proposals comply with Part O of the Building Regulations.

Flood Risk & Sustainable Drainage

- 6.113 The proposed development is located in Flood Zone 1. The submitted Flood Risk Assessment and Drainage Strategy confirm that the Site is not at significant risk from river, sea, reservoir, or surface water flooding, and groundwater flooding risk is low.
- 6.114 The Surface Water Drainage Strategy is designed to minimize flood risk by significantly reducing discharge rates to the public sewer. Separate drainage systems for foul and surface water are planned, with surface water to discharge into a public surface water sewer and foul water into a public foul water sewer, as confirmed by Thames Water.
- 6.115 In accordance with the London Plan, surface water management will include Sustainable Drainage Systems (SuDS) features. The discharge rate will be restricted to a Greenfield run-off rate of 2.84 l/s, accommodating a 1-in-100-year storm event plus a 40% allowance for climate change. This approach is expected to improve surface water discharge rates by up to 99% compared to existing conditions.
- 6.116 The proposed SuDS features include bioretention systems, pervious pavement, and attenuation tanks, designed in collaboration with the landscape architect to enhance water quality, amenity, and biodiversity.

Fire Safety

- 6.117 London Plan Policy D12 requires development proposals to achieve the highest standards of fire safety, embedding these at the earliest possible stage: "In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety...". In addition, London Plan Policy D5 requires proposals to ensure

safe and dignified emergency evacuation for all building users. The GLA also published draft guidance in March 2021 on Fire Safety to ensure that developments achieve the highest standards of fire safety.

6.118A Fire Statement has been prepared in accordance with London Plan Policy D12 and D5, as well as the applicable guidance. This report confirms the development is not a 'high risk building' in Building Regulations terms and outlines the fire safety provisions required for the proposed development to be compliant with the Functional Requirements of the Building Regulations 2010 (as amended). It is proposed that the development is delivered in accordance with the recommendations of the Fire Statement and as such will comply with the relevant policy and guidance.

Ecology & Biodiversity

6.119At national level, enhancing biodiversity through planning and development is integral to the broader environmental goal of achieving sustainable development. All new developments (with some exceptions) are mandated to deliver a 10% biodiversity net gain. The NPPF (2023) emphasises the importance of leveraging opportunities to secure these net gains. Planning policies and decisions are expected to contribute to and enhance the natural and local environment, which includes safeguarding and improving valued landscapes and biodiversity sites. This also involves minimising impacts and providing net gains for biodiversity, including the creation of coherent ecological networks that are resilient to both current and future pressures (NPPF paragraph 187).

6.120London Plan Policy G5 states major development proposals should contribute to the greening of London by including urban greening as a fundamental element of Site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls, and nature-based sustainable drainage. The GLA Urban Greening Factor LPG (March 2021) provides further guidance on integrating urban greening within the design process and how to undertake the calculation.

6.121Additionally, NPPF paragraph 192 outlines key principles for assessing planning applications, reinforcing the goal of conserving and enhancing biodiversity. It highlights the need to integrate biodiversity considerations into design and to seek measurable net gains or improvements in public access to nature where feasible.

6.122An Ecological Appraisal and Biodiversity Net Gain ("BNG") Assessment have been prepared to support the planning application. It is noted that the site's ecological value is generally low with common and widespread habitats present. The risk of presence and significant impact to protected, priority and rare species or notable habitats was identified as very low/negligible.

6.123The proposals offer opportunities for biodiversity and ecology improvements via soft landscaping and tree planting. The design strategy and landscape features play a crucial role in the substantial increase in biodiversity. The scheme achieves a 46.55% improvement in habitat units and a 918.14% increase in hedgerow units compared to the existing site conditions, which significantly exceeds the 10% requirement.

7 Scheme Benefits

7.1 The proposals deliver a significant range of benefits that will support the wider local community, including:

- The provision of 130 high quality built to rent homes across a mix of 1 bed, 2 bed and 3 bed units which will assist meet local housing needs.
- The commitment to deliver 50% affordable housing (measured as habitable rooms), of which 30% will be provided at London Living Rent and 70% at Discount Market Rent.
- The increased resident population will assist the long-term sustainability of the town centre by supporting the local businesses and the local economy.
- Redevelopment of a surface level car park supporting Mill Hill Broadway train station which will encourage users to travel by mode sustainable and/or actives modes of transport, and reduce reliance on the private car.
- Improvements to the western entrance to Mill Hill Broadway Station including provision of cycle parking and pick up/drop of facilities.
- Significant public realm improvements along Bunns Lane, including the removal of the unattractive retaining wall and the creation of a more pleasant and active street frontage.
- High quality architectural design that responds to the Site context, and acts as a landmark for the town centre.
- Significant urban greening, tree planting and high-quality landscaping.
- The design strategy and landscape features play a crucial role in the substantial increase in biodiversity. The scheme achieves a 46.55% improvement in habitat units and a 918.14% increase in hedgerow units compared to the existing site conditions, which significantly exceeds the 10% requirement.
- The delivery of vibrant well managed community amenity space will provide new places for people to gather, assisting to increase the sense of community.

8 Section 106 Heads of Terms

8.1 In accordance with Section 106 of the Town and Country Planning Act 1990 (as amended), planning obligations can be used as part of the planning application process to address specific planning issues arising from development proposals. Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 requires that planning obligations must only be sought where they meet all of the following tests:

a) "Necessary to make the development acceptable in planning terms

b) Directly related to the development; and

c) Fairly and reasonably related in scale and kind to the development"

8.2 It is anticipated that an appropriate package of Section 106 Contributions will continue to be discussed with Officers following the submission of the planning application. However, the Applicant anticipates entering into a Section 106 Legal Agreement as appropriate to secure the regenerative benefits of the scheme. It is anticipated that the Section 106 Agreement will cover the following matters:

- Travel Plan Monitoring;
- Carbon Offsetting;
- Play space and amenity enhancement; and
- Section 106 Monitoring.

8.3 In addition to Section 106 contributions, LB Barnet's current Community Infrastructure Levy (CIL) Charging Schedule was adopted on 1 May 2023, and the Mayor of London also charges CIL (MCIL) for development. CIL is a charge which can be levied by local authorities on new development in their area to help them deliver the infrastructure needed to support development in their area. The development is expected to deliver in excess of £4million in CIL payments.

9 Conclusions

- 9.1 This Statement has been prepared to support the submission of a planning application to London Borough of Barnet (“LB Barnet”) in relation to the Bunns Lane Car Park Redevelopment for 130 dwellings, 50% of which are provided as affordable homes.
- 9.2 The Site is specifically allocated for redevelopment in LB Barnet’s Revised Local Plan, and the proposals meet the requirements set by national, regional and local policy to direct development to brownfield land in highly sustainable town centre locations near existing public transport. The proposals will enhance the vitality and viability of the town centre by providing more residential development and making a contribution to meeting housing need in the borough, assisting LB Barnet to meet the delivery targets set by Government.
- 9.3 The proposals have benefitted from extensive pre-application engagement with the LB Barnet planning department, during which the design of the development has been refined. The proposals have also been subject to community consultation including public exhibitions and bespoke briefings and feedback has been incorporated where appropriate.
- 9.4 The proposals accord with national, regional and local planning policy and should be approved without delay.