



**Planning Response to the Mayor's Stage 1 Report**

**Brunswick Park, Osidge Lane, London, N14**

**GLA Ref: PDU/2594/GK01**

**LB Barnet Ref: B/01960/10**

## **1.0 Introduction**

- 1.1 The Mayor's Stage 1 Report sets out that '*on balance, the application does not comply with the London Plan.*' However, the report notes that additional information and changes may remedy the deficiencies and lead to the application becoming compliant with the London Plan. Further information is requested in relation MOL; Urban Design, Climate Change Mitigation and Transport.
- 1.2 The following report seeks to address the concerns raised by the Mayor and provide the additional information requested. The information is provided under the headings taken from the GLA Stage 1 Report.

## **2.0 Land Swap**

- 2.1 Evidence of the agreement with Brunswick Park Primary School to alter the boundary of the school will be provided by separate letter.

## **3.0 Metropolitan Open Land**

- 3.1 The Mayor has requested additional information in relation to the '*very special circumstances*' required for development to take place on MOL. The Stage 1 Report concludes that "*the 'very special circumstances' put forward by the applicants to outweigh harm to MOL caused by the proposed development are accepted in principal but further information and evidence is required.*"

### Community Need

- 3.2 In the first instance, the Stage 1 Report requests further information on the existing condition of the facilities to be replaced by the co-located facility.
- 3.3 The Planning Statement sets out, in paragraphs 6.6 to 6.13, why these facilities are proposed to be relocated to the co-located facility, namely that there is a need for modern facilities to replace the existing out dated facilities. Specifically, LBB have provided further information setting out why it is considered necessary to locate these facilities at the proposed co-located facility which are set out below:
- a. The existing Medical Centre on Osidge Lane/ Brunswick Park Road was recently fire damaged and the cost of refurbishing the unit is prohibitive.

- b. The existing Library on Osidge Lane was built in the 1970s. The property is dated in terms of its building structure. It is inefficient in energy terms and does not comply with the DDA. The cost of refurbishment would be prohibitive.
  - c. The existing Acorn Centre is sited at Oakleigh School in North Whetstone in the centre of the borough. In order to make this facility more accessible borough wide, LBB have divided this facility with the aim of providing an Acorn Centre in both the east and west of the borough. An Acorn Centre has already been provided in the west at Colindale School and it is proposed to provide the facility for the eastern part of the borough at Brunswick Park. By providing the facility within a co-located facility it will allow users of the Acorn Centre to take advantage of the other facilities provided on site.
  - d. The existing Nursery at Hampden Way is to be re-provided on site. The existing nursery is a well used local facility however the building facilities are dated, comprising a converted bomb shelter and several portacabins. The nursery is oversubscribed and there is insufficient space to carry out alterations to accommodate the extra need. Relocating this facility to the co-located facility will ensure a modern, purpose built facility for users and provide the community with further access to a service that is in high demand. Relocating this facility to the co-located facility will ensure a modern and purpose built facility for users. It is likely that this site will be allocated for future development although this has not been confirmed.
- 3.4 The provision of the pharmacy and café on site do not involve any relocation from another part of the borough. Their inclusion is to enhance the co-located facility, providing complementary services to the other proposed uses on site.
- 3.5 The benefits of co-locating these facilities is clearly set out in the Planning Statement. The need to upgrade these facilities provides the opportunity for including them within the co-located facility and enhancing them through the links created by such a facility.

#### Lack of Other Appropriate Sites

- 3.6 The Stage 1 Report requests that further information is provided in relation to the site selection assessment. The Planning Statement sets out, in paragraphs 8.27 to 8.43, the site selection process undertaken by LBB in relation to the need for the development to be located on MOL within Brunswick Park. This related specifically to the sequential test undertaken for the LBB Primary School Capital Investment

Programme (PSCIP) for Brunswick Park Primary School in 2006 and sets out the rationale undertaken by LBB in applying this to the location of the co-located facility.

- 3.7 The Stage 1 Report however has requested additional information regarding the differences between the criteria for site selection of Brunswick Park Primary School, as part of the PSCIP, and the co-located facility. The Stage 1 Report provides an example of this difference in criteria being the difference in size of the site's required for both facilities, with a new school requiring 1.93ha and the co-located facility requiring 0.6ha.
- 3.8 The Stage 1 Report also requests that the existing sites of the facilities to be relocated to the proposed co-located facility are considered as part of the site selection process.
- 3.9 The rationale for the site selection process of the co-located facility is for sites that lie within a 1km radius of the existing library and medical centre. This is based on the fact that the proposed co-located facility needs to remain accessible to existing users of the library and medical centre.
- 3.10 The available sites within a 1km radius of the existing medical centre and library site are set out below. These sites are all included within the PSCIP assessment of the area as there are no other sites available for development within this catchment. The only other sites included within this assessment are the Hampden Way Nursery Site (from which the proposed nursery is to be relocated) and the only site allocation included within the LBB UDP within this catchment. These have been assessed with specific reference to the proposed co-located facility.

***Site 1 – North London Business Park***

- 3.11 This site lies to the south west of the existing medical centre and library site. It is not in the ownership of the Council. It is a large site currently comprising office and educational buildings, associated car parking and sporting facilities. This site is allocated for mixed use redevelopment in the LBB UDP (2006), the Core Strategy Direction of Travel Document (2009) and a Planning Brief for the site was adopted in 2006. It is allocated as an Industrial Business Park (IBP) in the London Plan (2008).
- 3.12 The Planning Brief for the site seeks to make existing employment land more attractive to businesses by encouraging a mix of uses on site including residential development on land not zoned for commercial use, and supporting services such as local convenience retail, health, education, day care and small scale leisure facilities.

The planning brief notes that the supporting services will provide opportunities for the day time as well as the evening and weekend economies created by the new residential communities. The Core Strategy document allocates the site for 400 new residential dwellings.

- 3.13 The NLBP site is therefore allocated for development including community uses. The community uses are however primarily to support the future community proposed on site rather than the existing surrounding community.
- 3.14 The allocation of the co-located facility on this site would result in a fairly isolated facility, given the size of the NLBP and the relative distance from the site to the local residential communities.
- 3.15 Furthermore, much of the site is allocated for commercial use or is designated as sporting facilities and playing fields. In addition, the site is identified as employment land within the London Plan (IBP) and any change of use or loss of IBP land would require justification in London Plan Planning Policy terms.
- 3.16 In conclusion, this site is large and fairly isolated, it is identified as a protected Industrial Business Park within the London Plan and the Council are not in control of the site as they do not own it. It has therefore been discounted on this basis.

#### ***Site 2 – Oakleigh Road South***

- 3.17 This site lies to the south of the NLBP and is also allocated for development within the aforementioned Planning Brief. It is not owned by LBB. It is outside the 1km catchment area and is inaccessible. It has therefore been discounted for these reasons.

#### ***Site 3 – Land at Marshall Close***

- 3.18 The site lies approximately 1km to the south east of the existing medical centre and library site. It is owned by the Council. It was once a garden of remembrance and lies adjacent to a cemetery. It is not clear whether it was once a burial site. It is also heavily wooded and has poor access. For these reasons the site is considered an unsuitable location for the proposed co-located facility.

**Site 4 – Oak Hill Park**

- 3.19 This site lies approximately 0.5km to the north east of the existing medical centre and library site and is owned by LBB. The site is allocated as Metropolitan Open Land and is a well used local recreational facility and includes sports fields, an outdoor gym, café, bowls green, pavilion with changing rooms, toilets, golf course, multi-sports court, play area, tennis courts and has an on site Park Keeper.
- 3.20 The site is large enough to accommodate the proposed co-located facility however as it is sited on MOL special circumstances would need to be demonstrated. The site is very well used and is an important community facility for formal and informal recreation. There appears to be no circumstances that would justify the loss of a part of this site to provide a co-located facility given the extant community benefits the site provides. In addition, Oak Hill Park is some distance from the existing medical centre and library site. For these reasons the site is considered unsuitable as a location for the proposed co-located facility.

**Site 5 – New Southgate Recreation Ground**

- 3.21 The site lies approximately 1km to the south of the existing medical centre and library and is owned by LBB. It is an area of parkland which is designated as Metropolitan Open Land. It provides a variety of amenity facilities including play areas, football pitches, tennis courts, golf and a cricket pitch.
- 3.22 The site is large enough to accommodate the proposed co-located facility however it provides important and well-used recreational facilities for the public and is sited on MOL. The provision of the proposed co-located facility on this site would require demonstrating 'very special circumstances' and given the substantial community benefits resulting from the facilities provided on site, it does not appear that there would be justification for developing part of the site. Furthermore, it lies at the edge of the search area. For these reasons the site is considered unsuitable as a location for the proposed co-located facility.

**Site 6 – Hampden Way Nursery Site**

- 3.23 As discussed above, this site will be vacated as it is proposed that the nursery will re-provided at the proposed co-located facility. The vacated site would however be too small to accommodate the proposed co-located facility. The site is 0.2ha in size and at least 0.6ha is required.



**Site 7 – Denham Road Site**

- 3.24 This site is allocated in the LBB UDP (2006) to the north west of the existing medical centre LBB. This site was not included in the PSCIP redeveloped.

**Site 8 – Brunswick Park**

- 3.25 The site lies directly to the east of Brunswick medical centre and library site. It is allocated is an area of grassed open space and is used
- 3.26 The use of this site for a co-located facility unless 'very special circumstances' are provided
- 3.27 The site is at the edge of Brunswick Park and Primary School and its access road. It provides a facility whilst allowing the existing medical centre replacement MOL. Therefore, the impact of less than other identified alternative sites due to
- 3.28 In addition, Brunswick Park, while providing the community facilities of Oak Hill Park and proposed co-located facility would improve facilities such as the proposed café would enhance
- 3.29 On-balance therefore the Brunswick Park location the proposed co-located facility with the catchment locally as well as the benefits created by the 'very special circumstances.'

**Suitability of Sites of Existing Facilities to be**

- 3.30 In relation to whether the existing sites of the suitable for the location of the proposed co-located Planning Statement sets out why the existing site not be appropriate given its size, shape and form to accommodate the proposed co-located

*parking and access requirements. Also the differences in levels across the site would make creating a level and accessible facility problematic and costly.'*

3.31 In addition, paragraph 6.19 of the Planning Statement sets out that it is a key requirement of LBB that the existing library remains operational during the construction period. The redevelopment of the existing medical centre and library site would therefore involve the closure of the library for approximately 12 months during the construction period. This is accepted by GLA Officers as set out in paragraph 25 of the Stage 1 Report.

3.32 With regard to the existing Acorn Centre site, this is situated at Oakleigh School, to the north west of the site. This is outside the 1km radius catchment area set out to ensure the accessibility of the proposal. The site was therefore discounted.

3.33 With regard to the Hampden Way Nursery site, this lies within the catchment area. The site is however too small for the proposed co-located facility. It is 0.2ha in size. It was therefore discounted on this basis.

#### **4.0 The Osidge Lane Site**

4.1 The Mayor has specifically questioned the applicants' decision to discount the site fronting Osidge Lane and has urged the applicant to reconsider developing this site over the proposed area of MOL.

4.2 GLA Officers, in paragraph 25 of the Stage 1 Report, accepted the reasons set out in the Planning Statement that the Osidge Lane site would not be appropriate for the co-located facility. The Planning Statement set out the following reasoning as to why development would not be appropriate:

*"The existing car park, access road, community hall and Scout Hut site, fronting Osidge Lane was also discounted. This is primarily because the car park lies within the Flood Zone and could therefore not form part of the proposals. Also, the Scout Hut is a valued local facility. The Scout's were originally offered a new hall through the masterplan development by LB Barnet however this was dismissed by the Scout's and local community during initial public consultation regarding the future of this part of the Brunswick Park locality. As consensual development is encouraged by PPS1, the Scout Hut was not included as part of the masterplan for the wider area. Nevertheless, the redevelopment of the Scout Hut would require more land*



*than is currently available within the existing masterplan boundary and it is likely that its redevelopment would require that more MOL is developed on."*

- 4.3 In response to the Mayor's request that the Osidge Lane site is reconsidered for development, we have re-assessed the site and set out below the reasons why we do not consider it possible to locate the facility on this particular site.
- 4.4 The first reason above relates to an error on our part with regard to the site lying within the Flood Zone. On re-visiting the potential for development on the site, it became apparent that the site lies close to but not within the Flood Zone. The issue relates however to the fact that one 900 mm diameter foul trunk sewer runs beneath the site from north to south with a separate 225 mm (TBC) diameter foul sewer running adjacent to the 900 diameter sewer, as well as a 525 mm diameter surface water trunk sewer running from west to east beneath the existing car park and adjacent to community hall and scout hut.
- 4.5 Thomasons have confirmed that these sewers are located at substantial depths of up to 5.0 m below existing ground levels and redevelopment of the site would involve diverting these sewers to ensure easement requirements stipulated by Thames Water are maintained for future maintenance purposes. Any diversions would be undertaken at similar depths below existing ground level and would potentially affect the water table given the depth of the sewer. Diversions would also be pushed either closer to the existing adjacent residential properties or embankment to Pymmes Brook which may be impractical to undertake when considering the effects of deep excavations adjacent to existing properties. Ground water has been identified at relatively shallow depths of approx. 0.9 m below existing ground level with strong flows detected within the Site Investigation report. Any diversions at depth are likely to require a specialist de-watering plant and the effects of de-watering could result in settlements and localised instability which increases the risk to adjacent properties and roads should diversion be located closer to these.
- 4.6 Drawing No. C10246/80 provided in Appendix 1 shows the foul and surface water trunk sewers which run through Brunswick Park, to the east of the proposed co-located facility, northwards through the proposed car park and beyond. Thomasons have advised that it is extremely unlikely that Thames Water would agree to the diversion of these sewers given that it would involve substantial works close to residential properties, to a depth of over 5m and would require that the sewer is temporarily stopped in order for the diversions to be connected up potentially requiring the system to back up during these connection works. The necessary easements zones around the existing foul trunk sewers and surface water sewers

have been highlighted in blue, identifying the exclusion zones required away from any building line. Two minor sewers are being diverted on sites which connect to this trunk sewer. The yellow areas on the drawing show the required easement adjacent to the sewers. We also enclose a copy of the Thames Water Sewer Records provided in Appendix 2 for your information highlighting existing sewer runs and depths.

- 4.7 The costs of undertaking this work would be prohibitively expensive, as well as the logistics and risks associated with deep excavations, dealing with site conditions and risks to adjacent properties and land. This would not be a viable option in relation to this proposed development.
- 4.8 The option of building over these sewers have been considered however it is also extremely unlikely that Thames Water would consider this option given the importance of access to these trunk sewers. Further complications would be the adversely increased costs of introducing bridging foundations within the ground to avoid surcharging the existing sewers due to the location of the existing sewers.
- 4.9 Furthermore, it is questionable as to whether there would be sufficient space on site to provide the co-located facility if the trunk sewer was diverted given the required easements.
- 4.10 There is also a risk of cross contaminating the site due to the existing contamination that has been identified within the Site Investigation report undertaken adjacent to the existing sewers and the increased extent of site arisings due to deeper excavations. This stems primarily from the historical sewage works that were located on site previously, hence deeper excavations are likely to increase the risks of managing site contamination and prohibitive in terms of cost associated with increased management.
- 4.11 The architects, Sprunt, have also provided additional information as to why the site is not suitable for the location of the co-located facility. These are separate design issues and somewhat hypothetical given the constraints resulting from the trunk sewers set out above. These are set out below:
- a. The idea for co-locating all the proposed activities is to create a one-stop-shop for residents, champion collaboration between public services and avoid building areas being wasted on spaces which can be shared (such as entrances, waiting, reception and staff areas etc);

- b. The co-located facility requires a large proportion of its space to be directly accessible on the ground floor to ensure that the facility is accessible to all and to avoid lift congestion;
- c. The footprint of the proposal is considered as having been optimised (with all services on the ground floor and all staff areas on first floor) and we would not expect it to be reduced on any other site configuration;
- d. One essential element of the brief is to provide the opportunity for creating a secured short link between the co-located facility and the adjacent school in the future so that areas of the proposal can be used by the school children without having to use the street access or park;
- e. The site we currently propose to use for car parking along Osidge Lane is not considered as available for construction for the following reasons:
  - Any building would cut the views and links from the linear park north of Osidge Lane to Brunswick Park,
  - It would not provide the opportunity for linking the new facility and adjacent school or Phase 2 of the Masterplan;
  - It would sit very tightly on the available area. It would therefore be difficult to build safely even if the Scout Hut was demolished. The proposal would also lie close to the Pymmes Brook Site of Nature Conservation Importance.. Note: the access road leading from Osidge Lane to the school cannot be moved westwards due to already tight swept paths, therefore no space can be gained between the access and the house fronting Osidge Lane on this side of the site;
  - The MOL would need to be used for car parking or car parking would have to be provided underground and therefore hit water tables which would require full tanking of the structure and therefore make costs prohibitive. Public underground car parking is also considered difficult to manage due to accessibility and security issues, particularly for a small facility like this.
  - We could also consider building the co-located facility on stilts to free-up ground floor space for under-croft car parking but this would create serious access issues with ramps circa 80m long to avoid congestion. This option

would also push the building envelope to 3 storey, something not considered appropriate given the surrounding streetscape and open space.

- 4.12 As set out above, the architects consider that the footprint of the building is optimised. The building as it currently stands would almost entirely cover the plot of land at fronting Osidge Lane and thus the car park would need to be located to the rear of the co-located facility, on MOL. This proposal would block all views into Brunswick Park and also block the existing connectivity between the MOL to the north of Osidge Lane and Brunswick Park. It would result in built development on the MOL in the form of the car park.
- 4.13 Re-designing the building so that the car park area can be accommodated adjacent to the co-located facility, fronting Osidge Lane, would result in a significantly taller, less efficient and accessible building. It would also block views into Brunswick Park and lessen the connectivity between the MOL to the north of Osidge Lane and Brunswick Park. Furthermore, it would negate the need to re-provide MOL on the existing library and medical centre site. This site could therefore be redeveloped.
- 4.14 We therefore have considered this site in substantial detail. It is very likely that it is not possible at all to build on the site given the existence of the trunk sewers, ground water and contamination issues. It is not physically possible to achieve a satisfactory building on site that would meet the needs of users of the co-located facility. Furthermore, locating the building on the Osidge Lane site would reduce access to and views of Brunswick Park and significantly reduce connectivity between the two areas of MOL.

## **5.0 Urban Design**

- 5.1 The Stage 1 Report sets out that the north-south link between the two areas of green space that runs through the proposed car park would be more effective at the edge of the car park rather than through its centre.
- 5.2 The architects, Sprunt, are currently discussing options with GLA Officers and amended plans and full response to this matter will be issued shortly.

## **6.0 Climate Change**

- 6.1 The Stage 1 Report requires that further information is provided in relation to regulated and unregulated carbon emissions. The Report also requires that the

applicant investigates where additional savings from energy efficiency measures can be secured.

- 6.2 Elementa are providing an updated Energy Report which will address these issues and will be issued shortly.

## **7.0 Transport**

- 7.1 Peter Brett Associates have provided an addendum to the Transport Assessment, addressing the points raised by TfL and have also updated the Travel Plan in accordance with the advice provided by TfL. These reports are enclosed.

## **8.0 Conclusion**

- 8.1 We trust this information is sufficient to address the issues raised in the Stage 1 Report. The proposed development for a co-located facility presents an opportunity to provide modern, up to date community facilities within a single location for local residents in a deprived part of the borough.
- 8.2 The London Borough of Barnet and Barnet PCT have a long standing ambition to regenerate this area through the creation of a community hub which will improve access to health facilities, services for children, young people and families and library facilities. Providing these services in a single location creates better physical links for users, reducing the need for separate trips and encouraging people using one service to make use of other services available.
- 8.3 It is also considered that the location of the co-located facility will enhance opportunities for users to enjoy Brunswick Park, combining trips to the co-located facility with a visit to the park, and through the use of the café. The proposal provides a new, landscaped area of MOL on the existing library and medical centre site which creates a new and enhanced entrance into the park.
- 8.4 This report demonstrates that the proposal site is the only available and physically appropriate site for the co-located facility within a 1km radius of the existing library and medical centre. Other potentially available sites within this catchment have been assessed in relation to the specific requirements of the co-located facility. The site at Osidge Lane has considerable physical constraints preventing its redevelopment. In addition, its development would create a significant physical barrier to Brunswick Park and would negate the need to provide the new area of MOL and entrance into Brunswick Park on the existing library and medical centre site.



- 8.5 We consider that '*very special circumstances*' have been demonstrated to justify the location of the proposed development on MOL. The proposal site is the only available site for the co-located facility within the catchment area surrounding the existing library and medical centre, there is a clear and compelling need for the replacement of the existing facilities within the co-located facility, and the proposal will be of enormous benefit to the local community.

Appendices



Appendix 1