

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

Introduction

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.

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.

Land Swap

Evidence of the agreement with Brunswick Park Primary School to alter the boundary of the school is set out in Appendix ?

Metropolitan Open Land

The Mayor has requested additional information in relation to the '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

In the first instance, the Mayor has requested information on the existing condition of the facilities to be replaced by the co-located facility.

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 a covering letter setting out why it is considered necessary to locate these facilities at the proposed co-located facility. This is included in Appendix ? and the reasons are summarised below:

- i. The existing Medical Centre on Osidge Lane/ Brunswick Park Road was recently fire damaged and the cost of refurbishing the unit is prohibitive.
- ii. 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.
- iii. 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.

- iv. 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 for 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. It is likely that this site will be allocated for future development although this has not been confirmed.

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.

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

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.

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.

The Mayor has also requested 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.

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.

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. These have been assessed with specific reference to the proposed co-located facility.

Site 1 – North London Business Park

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).

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.

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.

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.

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.

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 in this basis.

Site 2 – Oakleigh Road South

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

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

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.

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

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.

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

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

This site is allocated in the LBB UDP (2006) for residential development. The site lies to the north west of the existing medical centre and library site and is not owned by LBB. This site was not included in the PSCIP and has been discounted as it has been redeveloped.

Site 8 – Brunswick Park

The site lies directly to the east of Brunswick Park Primary School and the existing medical centre and library site. It is allocated as MOL and a formal park area. The site is an area of grassed open space and is used for informal recreation.

The use of this site for a co-located facility would not be considered appropriate unless 'very special circumstances' are provided.

The site is at the edge of Brunswick Park and directly adjacent to Brunswick Park Primary School and its access road. It provides sufficient space for the co-located facility whilst allowing the existing medical centre and library site to be allocated as replacement MOL. Therefore, the impact of the development on this site would be less than other identified alternative sites due to this land swap.

In addition, Brunswick Park, while providing a valuable area of MOL, does not have the community facilities of Oak Hill Park and New Southgate Recreation Ground. The proposed co-located facility would improve and encourage the use the park and facilities such as the proposed café would enhance the recreation facilities.

On-balance therefore the Brunswick Park location is the most appropriate location for the proposed co-located facility with the catchment area. The lack of alternative sites locally as well as the benefits created by the proposed co-located facility demonstrate 'very special circumstances.'

Suitability of Sites of Existing Facilities to be Relocated

In relation to whether the existing sites of the separately located facilities would be suitable for the location of the proposed co-located facility, paragraph 8.22 of the Planning Statement sets out why the existing library and medical centre site would not be appropriate given its size, shape and topography, *'The site is not large enough to accommodate the proposed co-located facility alongside the associated car parking and access requirements. Also the differences in levels across the site would make creating a level and accessible facility problematic and costly.'*

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.

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.

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.

Osidge Lane Site

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.

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."

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.

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 a 900m diameter trunk sewer runs beneath the site. This sewer is located 5m below the ground and any redevelopment of the site would involve re-routing the sewer and would potentially affect the water table given the depth of the sewer.

Drawing No. C10246/04 provided in Appendix ? shows the sewer which runs 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 this sewer given that it would involve substantial works close to residential properties, to a depth of over 5m and would require that the sewer is stopped up temporarily requiring the system to back up. Two minor sewers are being diverted on site which connect to this trunk sewer. The yellow areas on the drawing show the required easement adjacent to the sewers.

The costs of undertaking this work would be prohibitively expensive, amounting to a likely sum of ?. This would not be a viable option in relation to this proposed development.

The option of building over the sewer has been considered however it is also extremely unlikely that Thames Water would consider this option given the importance of access to this trunk sewer.

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.

With regard to the water table, digging to a depth of over 5 m...? In addition there is an issue with contaminated land...?

The attached report and plan from Thomasons sets out this in more detail.

The architects, Sprunt, have also provided additional information as to why the site is not suitable for the location of the co-located facility and these are set out below:

1. 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);
2. 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;
3. 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;
4. 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;
5. The site we currently propose to use for car parking along Osidge Lane is not considered as available for construction for the following reasons:
 - a. Any building would cut the views between the linear park North of Osidge Lane and Brunswick Park,
 - b. It would not provide the opportunity for linking the new facility and adjacent school or Phase 2 of the Masterplan;
 - c. It would site 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;
 - d. We would need to use the MOL for car parking or provide car parking underground and hit water tables in addition to the constraints explained in 5. above. **CAN THIS BE EXPLAINED IN MORE DETAIL?**
6. We would not consider having buildings on stilts on general ease of access / flow of users ground; **CAN THIS BE EXPLAINED IN MORE DETAIL?**

We therefore have considered this site in substantial detail. It is not physically possible to achieve a satisfactory building on site and it very likely that it is not possible to build on the site given the trunk sewer.

Urban Design

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.

The architects and landscape architects, Sprunt, have provided the following information to justify the pathway:

1. The current location for the path at the centre of the car park links directly with the linear park across Osidge Lane;
2. It creates a green corridor between the two areas of car parking, therefore minimizes its impact;
3. It directly links with the DDA compliant ramp to access the new building;
4. It also connects with the existing path across Brunswick Park which is likely to be used by residents of the care home at the South-West of the site;
5. If the path is re-located along the Scout hut, significant retained existing trees would have to be removed to keep the number of parking bays;
6. The majority of the main entrance path to the site is actually on LB Barnet land and is not designated as MOL.
7. Various pre app meetings with the GLA indicated they would like to maintain the openness and green link route through to the MOL land. Pushing the path to the edge of the scout hut we consider would:
 1. Lead to the removal of additional trees,
 2. Create a large single car park with no real segregation between staff and visitors
 3. Impact on the context as a single material would be used due to ease of construction this would all need to be block paving (currently proposed grass grid for staff areas).
 4. Potentially impact on pedestrian safety as people naturally take the shortest route. This would be across a large car park.
8. Current proposals give the building a presence on Osidge lane without having a wide open super market style car park in front of it.
9. Access and way finding is simple with clear direct routes to the park and main entrance to the building.
10. The entrance path is not in the centre of the car park it is on the edge of the public car park. The staff car park is to be separated by bollards, hedging and vehicle access control.
11. Given that there is a finite number of spaces in the staff car park and that usage will be early morning and evening it is deemed that the potential conflict with pedestrians would be minimal (far less than pedestrians following their natural desire lines across one large space.)
12. All park maintenance vehicle access would be via Nurseryman's Road to the South west of the site.

Climate Change

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.

Elementa have provided an updated Energy Report which addresses these issues and is enclosed.

Transport

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.

Conclusion

We trust this information is sufficient etc etc