



New Barnet Community Association
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11/06/20

Hardeep Ryatt BA (Hons) DipTP MRTPI
Principal Planner
Major Projects Team
Barnet Planning Department
2 Bristol Avenue
Colindale
London NW9 4EW

Dear Mr Ryatt,

REQUEST FOR KAREN MILLER/JOHN DIX TO SPEAK AT COMMITTEE

Application No 20/1719/FUL – Land Formerly Known As British Gas Works Albert Road New Barnet EN4 9SH

I am writing on behalf of NBCA and the Save New Barnet Campaign to object to the above application and to request to speak at the committee meeting.

Detailed below are the main reasons for our objections and the supporting evidence for our statements are set out in the appendices attached to this letter.

Main reasons for objections:-

1. **Housing Mix** – The scheme is in **breach of Council Planning Policy DM08**: Ensuring a variety of sizes of new homes to meet housing need and **Draft Local Plan Policy HOU02**. The evidence to support our statement is set out in Section 2 of the Appendix to this document.
2. **Tall Buildings** – The scheme is in **breach of Council Planning Policy DM05 and Core Strategy CS5** as the site is not within a strategic location as detailed in the core strategy. In addition it does not reflect the council's current thoughts on Tall Buildings as set out in the **Draft Local Plan Policy CDH04**. It is also **contrary to Planning Policy DM01(b)** in that it fails to preserve or enhance local character and respect the appearance, scale, mass, height and pattern of surrounding buildings, spaces and streets. The detailed evidence for our statement is set out in Section 3 of the Appendix to this document.
3. **Housing Density** – The scheme is in **breach of Barnet's Core Strategy Policy CS3**: "Our strategic approach on further development opportunity sites will be set within the context of the density matrix in the London Plan. We will seek to **optimise rather than simply maximise housing density** to reflect local context, public transport accessibility and provision of social infrastructure". The detailed evidence for our statement is set out in Section 4 of the Appendix to this document.

4. **Amenity/ Play Space** – The scheme fails to provide the required private amenity space and play space for children 5 years or older. As such it is clear that the scheme fails to meet the GLA guidelines for play space and ***fails to meet Barnet’s Planning Policy DM01 (g)*** which states that “Development proposals should retain outdoor amenity space having regard to its character”. The detailed evidence for our statement is set out in Section 5 of the Appendix to this document.
5. **Poor Quality Design** - At the most fundamental level, the failure here to produce a ‘good design’ is a failure to provide decent homes in pleasant surroundings which improve the everyday quality of people’s lives. A detailed design review is attached which sets out our evidence, a summary of which includes:
 - Monolithic, rectilinear massing of high rise blocks with lower sections read as ‘stuck-on’.
 - Uniform and repetitive building typologies.
 - Aerial views highlight the utilitarian uniformity of the blocks.
 - Flat facades create a ‘wall’ of building with little visual relief which dominates and overshadows surrounding open spaces.
 - A generic grid overlaid on the site, resulting in uniform footprints and massing and repetitive building typologies and a lack of visual amenity.
 - Seven storey blocks are orientated with the longer elevation addressing the park, creating a wall of high rise building which dominates the park.
 - Eight and nine storey blocks behind block views into the site.
 - Generic approach and lack of visual amenity.
 - Individual blocks allow train noise to penetrate
 - 110 flats with habitable rooms directly facing the railway.
 - Tall buildings either side of the new spine road has been created a ‘noise canyon’ with noise pollution levels that are severe enough to require mitigating.
 - Closely spaced, high rise blocks overshadow habitable rooms, particularly on lower floors.
 - Daylight levels fall below the recommended level in living/kitchen/dining rooms, particularly on the lower floors in the middle row blocks.
 - Distances between blocks appear likely to be well below 21 metres compromising privacy in habitable rooms.
 - 30% of rooms do not meet BRE guidelines in achieving recommended level of sunlight.
 - Eleven of the twelve blocks significantly exceed the LHDG recommended limit of 25 dwellings per core - 521 dwellings in all.
 - One block (Block A) has 67 dwellings per core, almost 3 times the LHDG recommended safe maximum.
 - Flats in Blocks B1 and C1 are a distance of 31 metres between entrance door and lift/stair, breaching recommendations of the Smoke Control Association guidance (2015 revision).
 - In some flats the kitchen area is immediately adjacent to the door, posing a considerable risk of blocking the residents’ sole means of escape – critical in a ‘flat of origin’.
 - Some flats in Block A show open plan arrangements which do not comply with standard building regulations arrangements.
 - The use of uPVC windows, which are flammable, has been implicated in the spread of flat fires including Lakanal House.
6. **Poor quality supporting reports** – a number of supporting evidence reports appear to be rushed, with factually incorrect or misleading information. As such we request that the Health Assessment report is rejected and a proper and factually correct report submitted before the application is considered. We would also ask that the noise measurement are repeated using a more appropriate location to measure train noise.

7. ***Failure of official consultees to respond*** – we are very concerned at the very small number of official consultees who have responded to the Council’s request for comments. We have tried to contact a number of these consultees and have found that, due to Covid-19, many organisations are struggling to respond with staff either working from home or furloughed. As such we do not believe that it is safe to take decisions without receiving those comments.

We have taken great care to review Fairview’s application in the limited time available to us. We have sought out the advice of experts where possible but this has been extremely restricted during Covid-19 lockdown. For the large part, we have used the information provided by Fairview to demonstrate specifically how they are failing Council, Regional and National Planning Policy and the residents of New Barnet.

For the above reasons we urge you to reject the application.

Yours sincerely

Lyn Forster
Chair, New Barnet Community Association