



New Barnet Community Association
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17/06/20

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

Dear Mr Ryatt,

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

Further to our objection of 11 June 2020, we have only just received additional information not previously disclosed and, as such, wish to add the following comments to our previous objection.

We ask that the application be refused on the basis that the developer has ignored critical pre application advice on building height, design, articulation of buildings including the following:

- The applicant was told in Pre-Application Advice that “Where buildings breach the (building height) policy threshold, we would require justification not only on townscape views, but also on the quality and function of these structures. The applicant has failed to provide any justification on the quality and function of these structures.
- The applicant was told in Pre-Application Advice that LBB “would require the articulation of buildings to assist in the perception of height and character variation. This is due to the limited height variations currently proposed when viewed from ground level”. Based on the proposed application, that articulation has not been fulfilled.
- The applicant was told in Pre-Application Advice that “The exaggerated vertical order is good for fronting a square to instil a more civic character, but this is not a civic square. It is a relaxing space that connects to the park and the architectural form should reflect this character and function”. Unfortunately the applicant appears to have ignored that advice as we still have an exaggerated vertical order.
- The Pre-Application Advice notes that there is “A general acknowledgement that improvements could be made to how movement patterns, active frontages and the quality of public realm could be improved”. However this has not been adequately addressed (if at all) in the application.
- The Pre-Application Advice notes that “Officers would like to see the results of the updated Daylight /Sunlight Assessment to ensure the optimal performance of the internal floor plans”. Given that the daylight assessment shows many habitable rooms failing to meet the minimum daylight levels and that 30% of properties fail to meet the BRE guideline on sunlight how can officers approve such poor standards.
- The Pre-Application Advice notes that “A greater understanding of how landscaping both within and adjacent to the site can assist in softening the proposed height and massing of the scheme”. We

would challenge whether any softening has taken place and that no end of landscaping will reduce significant overshadowing created by the height and massing.

- The Pre-Application Advice noted that “Officers... consider the proposed height strategy is more appropriate in respect of the local character and ‘political’ context”. It is not clear, under any circumstances, that this scheme could be said to respect the local character given that the area is characterised by low level suburban housing. It is also not clear what is meant by ‘political’ context but that certainly has not been articulated in any aspects of the design.
- The Pre-Application Advice notes that “It is appreciated that the building form and elevational detailing shown within the highlighted document, is at this point more **conceptual then proposed**” and that “more detailed design discussions should be the focus of the next meeting, once the building form and elevations have been developed further . However by Pre App Meeting Four, it was recorded that final elevations still needed further work. This work does not appear to have been completed, ignoring Officers’ advice.
- The Pre-Application Advice notes that “the proposed building heights, massing, siting and materiality should clearly demonstrate how it has optimised the spatial quality of the site’s public realm”. However in this scheme, landscaped spaces are the ‘left-over’ spaces between buildings. The spaces are not designed as ‘positive’ spaces – they are not seen as a generator for the layout (unlike the ‘green fingers’ in the previous scheme). The density means that it is the footprints of buildings which dominate.
- The applicant was told in Pre-Application Advice that “Officers would like to better understand how building form and articulation and site landscaping responds to the site’s open space and desired movement corridors”. We agree and note that this is still missing in the current application.

In addition we would note that:

- The Pre-Application Advice notes that “Officers are encouraged by the collaborative design process to date”. How can that be the case given that the applicant had refused to engage with the community who sent several emails requesting a dialogue and who have a track record of collaboration on the previous consented scheme? To make matters worse it appears that the public consultation undertaken by the developer in January 2020 was a complete sham in that they showed the public plans which had been superseded by the time the pre application notes were written in September 2019. By showing the public plans that they had no intention of building and had already agreed changes with planning officers four month prior to the consultation, invalidates any assertions they make in their Statement of Community Involvement and confirms that they:
 - Did not encourage input from local residents, community groups and stakeholders to help shape the proposals at an early stage
 - Failed to provide the community with a genuine opportunity to provide comments and feedback on the plans
 - Did not allow people to become actively involved in the planning process
 - Ignored and failed to address any issues raised by the local community and stakeholders

For all of the reason set out above we urge you to reject the application.

Yours sincerely

Lyn Forster
Chair, New Barnet Community Association