

Victoria Quarter

Overdevelopment and Poor 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”



Save New Barnet

Response to Planning Application 20/1719/FUL

June 2020

Response to Planning Application 20/1719/FUL

Contents

1.	Introduction	3
1.1.	Background - Site History	3
1.2.	Other Schemes in the Area	3
1.3.	Design Quality	3
1.4.	Public Consultation	3
1.5.	Summary	4
2.	Housing Mix.....	5
2.1.	Introduction.....	5
2.2.	Planning Policy.....	5
2.3.	One & Two Bedroom Units.....	5
2.4.	Housing for Downsizers	5
2.5.	Summary	5
3.	Tall Buildings	6
3.1.	Introduction.....	6
3.2.	Planning Policy.....	6
3.3.	Comparators.....	7
3.4.	Summary	7
4.	Housing Density:.....	8
4.1.	Introduction.....	8
4.2.	The London Plan	8
4.3.	Planning Policy.....	8
4.4.	Density Impact.....	8
4.5.	Summary	8
5.	Amenity/Play Space.....	9
5.1.	Play Space.....	9
5.2.	Amenity Space.....	9
5.3.	Summary	9
6.	Transport Connectivity & Parking Requirements	10
6.1.	Introduction.....	10
6.2.	Public Transport Capacity	10
6.3.	Car Parking	10
7.	Noise Report.....	12
8.	Health Assessment Report	15
8.1.	Health Profile.....	15
8.2.	Nursery & School Places	15
8.3.	Housing Mix:.....	16
8.4.	Healthcare Provision	16
8.5.	Open space	16

Response to Planning Application 20/1719/FUL

8.6.	Noise.....	17
8.7.	Sunlight & Daylight.....	17
8.8.	Traffic Calming.....	17
8.9.	Healthy Living.....	17
8.10.	Conclusion.....	17
9.	Design Review.....	18
9.1.	Introduction.....	18
9.2.	Height and Massing.....	18
9.3.	Breaches of Planning Policy.....	18
9.4.	Layout.....	18
9.5.	Noise.....	19
9.6.	Daylight and Sunlight.....	19
9.7.	External Space.....	19
9.8.	Housing Mix.....	19
9.9.	Shared Circulation.....	19
9.10.	Number of Dwellings Per Core.....	19
9.11.	Fire Safety.....	19
9.12.	Elevation Materials and Finishes.....	20
10.	Other Issues.....	21
10.1.	Waste Water and SuDS.....	21
10.2.	Views.....	21
10.3.	Arboriculture.....	21
10.4.	Sustainability.....	21
10.5.	Financial Viability Assessment.....	21
10.6.	Climate Change.....	21
10.7.	Urban Greening Factor.....	21

Response to Planning Application 20/1719/FUL

1. Introduction

1.1. Background - Site History

The community in New Barnet have spent many years working for a good quality housing development on the former Gasworks site at Albert Road. In 2015 the original scheme for the main site was granted planning permission with 305 homes and was amended again in 2017 to include the development along Victoria Road with a total of 371 houses and flats. This was a scheme developed collaboratively with the community, delivering a large number of well-designed and attractive homes on a brownfield site. Barnet granted planning consent in 2017 with remediation works commencing along with the construction of the spine road and the basement car park which are now complete.

The proposed scheme has fundamentally changed the original design, includes no houses and has 652 flats in a series of high density tower blocks, the tallest of which is 10 storeys.

Although the developer frequently states that the site has “good” transport connections, we would note the PTAL score for the front part of the site is 3, the rear of the site covering 6 of the blocks (F1, E, C1 & 2 and D1 & 2) with 287 units and parts of two further block,(B1 & B2) with 111 units has a PTAL score of just 1a which is classified as poor.

1.2. Other Schemes in the Area

It is important to set this development in the context of all the other proposed and consented schemes in the area which will also impact on the local infrastructure.

- At Cockfosters Station, 1.9 km from the proposed site, there are plans to build 351 flats on the car park. In addition, there is a proposal to redevelop the adjacent Black Horse Tower into 164 flats.
- At High Barnet Station, 1.7 km from the proposed site, there are plans to build between 300 and 450 new flats.
- Kingmaker House, 230 metres from the proposed site has planning consent for 94 units and an appeal pending for an additional 51 units bringing the total to 145 units.
- North London Business Park, 2.9km from the proposed site has planning consent for 1200 units.

With the 652 units in the proposed development this means the local infrastructure will have to support an additional 2,800 homes with approximately 6,000 people. This application cannot be viewed in isolation and must be considered in the context of the wider development taking place in the local area especially in terms of the strain it will place on local schools, doctors, dentists and public amenities like libraries and leisure facilities.

1.3. Design Quality

We have very serious concerns about the quality of the design and the supporting evidence. A number of the reports are either highly generic, cover only part of the scheme or lack crucial detail we would expect at this stage in the project. As such, we have carried out a detailed architectural review which looks in detail at the design and which we have appended at Annex 1

1.4. Public Consultation

The Statement of Community Involvement states that:

Government guidance and Barnet’s draft SCI (2018) encourage pre-application discussions and community involvement. As a result, the planned programme of consultation had a number of key objectives including:

- To encourage input from local residents, community groups and stakeholders to help shape the proposals at an early stage

Response to Planning Application 20/1719/FUL

- To provide the community with a genuine opportunity to provide comments and feedback on the plans
- To allow people to become actively involved in the planning process
- To identify and address any issues raised by the local community and stakeholders

As representatives of the community, NBCA feels that Fairview and One Housing failed to meet any of the objectives for the following reasons:

- Despite numerous requests for meetings, the first time NBCA became aware of the scheme was in January 2020 when public leaflets were sent out setting out a completely new and almost complete scheme. We were not consulted at the early stages.
- We were not provided with a genuine opportunity to provide comments and feedback as it became clear the developer was not prepared to engage with NBCA. The developer did not provide any responses to detailed written questions about the scheme and at the second meeting stated they were unprepared to enter into any form of dialogue and drew the meeting to a close.
- Even though we had a retired architect at our consultation meeting the developer refused to discuss any architectural aspects of the scheme. The exhibition boards provided very little detail and the low print resolution meant that it was impossible to discern even the most basic of details about the scheme.
- The developer failed to address any of the concerns raised including failing to respond to the following questions:
 - The maximum number of properties per block.
 - The height each block and where are they placed.
 - The distances between the blocks.
 - For each block what is the number of people using the entrance.
 - Where on the site are the affordable housing blocks.
 - What are the numbers of units by bedroom size.

The developers states that they held a second consultation in March but that “Although public exhibitions on the 12th and 14th March had to be cancelled in the wake of the Covid-19 pandemic, hard copies of consultation packs including the exhibition boards, feedback forms and freepost envelopes were still available to collect from two project team members in attendance outside the exhibition venue during what would have been the advertised exhibition hours”. If people are told the consultation is cancelled why would they come to the venue to pick up packs of information? As representative of the community NBCA had been chasing One Housing in mid and late 2019 to understand what was happening to the scheme as all the remediation works had been completed

1.5. Summary

We believe that the scale of development proposed in this scheme is excessive, of poor quality design and is out of keeping with the local area. Our specific reasons why this application should be refused are set out in the remainder of this document.

Response to Planning Application 20/1719/FUL

2. Housing Mix

2.1. Introduction

The proposed scheme contains no houses and no four bedroom properties. The number of three bedroom properties they are proposing makes up just 19% of the total whereas three and four bedroom properties made up 30% of the consented scheme.

2.2. Planning Policy

Planning Policy DM08: Ensuring a variety of sizes of new homes to meet housing need, states that:

“Development should provide where appropriate a mix of dwelling types and sizes in order to provide choice for a growing and diverse population for all households in the borough.

Our dwelling size priorities are:

- i. For social rented housing – homes with 3 bedrooms are the highest priority***
- ii. For intermediate affordable housing – homes with 3/4 bedrooms are the highest priority***
- iii. For market housing – homes with 4 bedrooms are the highest priority, homes with 3 bedrooms are a medium priority”.***

In addition, the Draft Local Plan (2020) sets a clear target of 70% of market properties and 44% of affordable housing to have three+ bedrooms.

2.3. One & Two Bedroom Units

The developer acknowledges that the scheme comprises a higher proportion of one and two-bedroom units than the planning policy requires but states that they believe this is considered “wholly appropriate given the proximity to the district centre and the station”. We have not seen any evidence to support this theoretical assumption.

The developer seems satisfied that the scheme has 192 two bedroom, four person flats. However, this is entirely unsuitable for teenagers of different genders and children who have become adults but cannot afford to move out. Given that the other developments taking place in the local area are also likely to be dominated by one and two bed flats there is a very real risk that families will be forced to decide between living in cramped or unsuitable accommodation or moving out of the area.

2.4. Housing for Downsizers

The scheme does not identify any housing suitable for or targeted at older people downsizing from larger family homes and the GLA Population Yield Calculator which the developer has used in their calculations suggests there will be only 26 people aged over 65 out of the 1,395 people in the development or less than 2%.

2.5. Summary

Given that the proposed scheme provides no four bedroom properties and only 19% of three bedroom properties it is clearly in breach of Policy DM08 and Draft Local Plan Policy HOU02 Housing Mix.

Response to Planning Application 20/1719/FUL

3. Tall Buildings

3.1. Introduction

In the proposed scheme 10 of the 14 block are seven storeys or taller. By comparison, the consented scheme has only one block which is seven storeys or taller. East Barnet Ward comprises 6,531 households and a population of 16,859. However, the only residential building within the entire East Barnet Ward that is in excess of 6 storeys is Desmond House on Cat Hill.

Comparison has been drawn with the office buildings in Station Road. However, this ignores the fact that the area in closest proximity to the proposed development including roads such as Victoria Road, Lawton Road, Westbrook Crescent, Park Road and Crescent Road is typified by low level two and three storey buildings.

The only other tall structure in the ward is the adjacent Gasometer and which at some time in the future is due to be removed when that part of the site is redeveloped, as identified as opportunity site 21 in the Draft Local Plan. The tallest building, Block A will sit just 5.5 metres below the top of the gasometer, a structure that dominates the skyline in New Barnet with two other blocks sitting just 9 metres below the top of the gasometer. The chain of tall buildings in this proposed development will irrevocably change the landscape and skyline of New Barnet.

3.2. Planning Policy

Barnet's Core Strategy sets out in Policy CS5 the key locations where tall buildings may be appropriate. These include:

- Brent Cross – Cricklewood Regeneration Area
- Colindale – Colindale Avenue Corridor of Change,
- Edgware Road Corridor of Change
- Grahame Park Estate
- Stonegrove and Spur Road Estate
- West Hendon Estate.

And the Priority Town Centres of:

- Edgware
- Finchley Church End and
- North Finchley.

It also clearly states that: ***“Outside of these specific locations, proposals for tall buildings will not be supported”***. The proposed site does not sit in any of these areas.

Planning policy DM05 states that “Tall buildings outside the strategic locations identified in the Core Strategy will not be considered acceptable. Proposals for tall buildings will need to demonstrate:

- I. an active street frontage where appropriate
- II. successful integration into the existing urban fabric
- III. a regard to topography and no adverse impact on Local Viewing Corridors, local views and the skyline;
- IV. not cause harm to heritage assets and their setting
- V. that the potential microclimatic effect does not adversely affect existing levels of comfort in the public realm.

Response to Planning Application 20/1719/FUL

As well as not being in a strategic location, the site does not have an active frontage, does not successfully integrate into the existing urban fabric, has no regard to the topography and harms the setting of the Victoria Recreation Ground.

In addition, the proposed development does not reflect the council's current thoughts on Tall Buildings as set out in the Draft Local Plan.

The New Barnet Town Centre Framework states in Development Principle 4.3 that:

- Building heights should be appropriate to the wider suburban context.
- Massing (bulk of buildings) should be reflective of the suburban setting and role of the town centre – over-dominance (visual) by any unit should be avoided.

The proposed scheme ignores this framework and confirmation that New Barnet has a suburban setting.

3.3. Comparators

The applicant makes reference to the buildings in Station Road as justification for including tall buildings on the proposed site. However, one of the buildings they cite is Kingmaker House. This building is seven storeys tall and as recently as September 2019 an application to add a further two storeys was refused by Barnet Council with the reasons given as follows:

*“The proposed development by reason of its massing, scale and **its excessive height** by virtue of the proposed extensions to the roof would **represent a significant departure from the local plan** detrimental to the character and appearance of the surrounding area. Furthermore, the proposed additional floors to the rear together with its excessive rearward projection would result in a visually obtrusive form of development detrimental to the visual amenities of the locality and the street scene when viewed from Lyonsdown Road elevation. As such the proposed development would be contrary to policies CS1, CS5 and CS NPPF of the Adopted Core Strategy (2012) and policies DM01 and DM05 of the Adopted Development Management Policies DPD (2012)”.*

As such it would seem inconsistent to approve the tall buildings on the proposed site having less than a year ago refused a building of nine storeys in Station Road.

3.4. Summary

The proposed scheme will introduce four tall buildings in an area not designated for tall buildings in breach of both CS5 and DM05 and as such fails to preserve or enhance local character and respect the appearance, scale, mass, height and pattern of surrounding buildings, spaces and streets contrary to Planning Policy DM01(b).

Response to Planning Application 20/1719/FUL

4. Housing Density:

4.1. Introduction

The existing consented scheme has a housing density of 386 habitable rooms per hectare (hr/ha). The proposed new scheme has increased this density to 625 hr/ha.

4.2. The London Plan

The London Plan guidance is very clear that for suburban environments like New Barnet, with a PTAL score of 1-3 that the density should be in the range 150-250 hr/ha. Even if New Barnet were considered an urban environment the density guideline is still only 200-450 hr/ha. The density the developer proposes is at the top end for Central sites which is 300-650hr/ha. For reference, the London Plan defines Central Areas as: “**areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an International, Metropolitan or Major town centre**” which is not a true or accurate representation of New Barnet.

4.3. Planning Policy

Barnet’s Core strategy states at 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”.

4.4. Density Impact

The impact of such high density properties is highlighted at length in the architectural review attached at Annex 1. In particular it has meant that daylight levels fall below the minimum standard on a number of flats, there is significant overshadowing and the number of dwellings using a single core significantly exceeds the safe limits.



4.5. Summary

The density of the proposed scheme is in breach of guidelines and represents over development. It breaches current **Policy CS3**, Draft London Plan Policy D6 and Draft Local Plan Policy CDH01 which seeks to **optimise** housing density rather than **maximise** housing density.

Response to Planning Application 20/1719/FUL

5. Amenity/Play Space

5.1. Play Space

The GLA Population Yield Calculator indicates the scheme will generate a population of 1395 people assuming a whole site PTAL of 3-4. For a site with a PTAL of 1-2 the population would increase to 1485, predominantly more children. The calculations are set out below:

PTAL 3-4	Market & Intermediate	Social	Total
Ages 0, 1, 2, 3 & 4	82.9	54.4	137.3
Ages 5, 6, 7, 8, 9, 10 & 11	55.1	43.0	98.1
Ages 12, 13, 14 & 15	13.5	21.5	35.0
Ages 16 & 17	7.1	11.4	18.5
18-64	900.2	180.4	1080.6
65+	21.5	4.2	25.7
Total Yield	1080.3	314.8	1395.2

PTAL 1-2	Market & Intermediate	Social	Total
Ages 0, 1, 2, 3 & 4	116.5	57.3	173.7
Ages 5, 6, 7, 8, 9, 10 & 11	76.4	43.7	120.1
Ages 12, 13, 14 & 15	17.3	19.8	37.1
Ages 16 & 17	9.2	10.4	19.6
18-64	916.9	190.9	1107.8
65+	21.8	4.5	26.3
Total Yield	1158.1	326.6	1484.7

The development provides just 1,372.8sqm of play space which is the minimum requirement for the 0-4 age group. By comparison the consented scheme provided sufficient play space for 0-11 age group. The GLA Play space calculator estimates the requirement for 2,888.7 sqm of play space and with a PTAL of 1-2 that space requirement would increase to 3505.6 sqm. Using a PTAL score of 0-2 the site would require of play space. The developer is assuming that 5-17 year old children will be able to use Victoria Recreation Ground. However, this fails to recognise that the park is already widely used by the community, especially since it was upgraded and that there are a number of other developments taking place within 400 metres, such as Kingmaker House, which will also use the park as their play space.

5.2. Amenity Space

The developer acknowledges that they have failed to provide the requisite amount of amenity space for the scheme. We calculate that they are 3,775.6 sqm short of the requirement.

5.3. Summary

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".

We note that the Design & Access statement says that the developer will "make a contribution for all other play age ranges required from the GLA's Play Calculator". We cannot see how play space for children aged 5-17 can be bought off with a "contribution".

6. Transport Connectivity & Parking Requirements

6.1. Introduction

The planning application states within the Design & Access Statement that the site benefits from good transport connectivity. However, six of the proposed blocks will sit entirely within the part of the site that has a PTAL rating of 1a. A further two blocks sit partially in the PTAL 1a zone. In total this amounts to 398 of the 652 flats that sit wholly or partially in PTAL zone 1a and as such it is entirely misleading to call this good transport connectivity. The walking distance from the front of the site is 1.7km to High Barnet Tube Station and 1.9 km to Cockfosters Tube station or as the developer phrases it “a convenient 25 minute walk”.

Page 16 of the Design & Access Statement shows a direct link to Luton Airport from New Barnet Station. This is incorrect as they are on different lines. A journey from New Barnet Station to Luton Airport would require a passenger to travel into Highbury & Islington, change to the London Underground Victoria Line into Kings Cross St Pancras and then catch a train from St Pancras to Luton Airport Parkway. As such it is entirely misleading to show connectivity which does not exist.

6.2. Public Transport Capacity

The assessment says the site is well connected for transport but given the volume of people on site there is no assessment of the adequacy of bus capacity to meet the transport needs of the 1,395 site residents. Given that at rush hour, buses are already full with school children and often do not stop as they are full, it suggests that the transport consultants undertook no investigation of bus capacity on these routes. In addition, reference is made to New Barnet Station. The same issues arise with trains stopping at New Barnet Station in the morning rush hour period between 7.15am and 8.45am. They are typically very crowded making it hard to board. The trains also only run into Moorgate or Kings Cross so have no benefit to commuters who have to travel across the borough for example to Barnet Council’s offices in Colindale. Without a detailed analysis of the capacity of buses and trains at rush hour it is entirely misleading to assume that all of the 18-65 year olds who may need to travel to work will be able to use public transport.

6.3. Car Parking

In the consented scheme there was one parking space allocated per household plus a small number of visitor spaces. This was a logical rationale set out by the developer. In the proposed scheme the number of car parking spaces is the same even though there are an additional 281 dwellings. The rationale this time is that residents do not need as many cars as they did three years ago as they will make much greater use of public transport, cycle or walk. This is clearly spurious and the reason the number of car parking spaces is the same is simply because the car parking basement is already constructed.

The Office of National Statistics (ONS) publishes data on household ownership of cars, see table overleaf. It breaks down households by tenure, income and composition. What is clear from this data is that car ownership is significantly higher than the proposed provision of 0.6 cars per household. It is important to note that in households with one or two children they are more likely to have two cars than one car per household. While it may be an aspiration that households can function without a car, the reality is in outer London families with children need at least one car and more likely two cars, especially if the lack of local school places means that parents have to transport their younger children to one or more distant schools.

Response to Planning Application 20/1719/FUL

ONS Table A47 - Percentage of households with cars by income group, tenure and household composition

	One car/van	Two cars/vans	Three or more cars/vans	All with cars/vans
All households	43	27	8	78
Gross income decile group				
Lowest ten per cent	33	[2]	..	35
Second decile group	47	6	:	54
Third decile group	58	12	..	71
Fourth decile group	58	19	[2]	80
Fifth decile group	58	21	4	83
Sixth decile group	51	30	4	85
Seventh decile group	42	43	6	91
Eighth decile group	33	48	13	94
Ninth decile group	27	47	19	94
Highest ten per cent	24	43	26	93
Tenure of dwelling¹				
Owners				
Owned outright	50	25	9	85
Buying with a mortgage	37	45	12	95
All	44	35	10	89
Social rented from				
Council	34	7	..	43
Registered social landlord ²	39	8	..	49
All	36	7	[2]	46
Private rented				
Rent free	61	[17]	:	78
Rent paid, unfurnished	46	22	[3]	70
Rent paid, furnished	38	[6]	..	45
All	45	18	[2]	65
Household composition				
One adult, retired mainly dependent on state pensions	42	..	:	43
One adult, other retired	50	52
One adult, non-retired	59	4	..	64
One adult, one child	51	..	:	57
One adult, two or more children	50	..	:	52
Two adults, retired mainly dependent on state pension	66	[18]	..	85
Two adults, other retired	55	30	4	89
Two adults, non-retired	36	42	6	85
Two adults, one child	41	43	4	88
Two adults, two children	39	51	4	93
Two adults, three children	43	36	[9]	88
Two adults, four or more children	[31]	[46]	..	82
Three adults	27	31	34	91
Three adults, one or more children	25	35	30	90
All other households without children	[19]	23	44	86
All other households with children	..	[37]	38	91

Evidence from other residential schemes is that limiting the number of on-site spaces simply forces residents to park on the surrounding roads. Combined with the PTAL rating of 1a on more than half of the units, this means that the on-site car parking capacity is unlikely to be sufficient to meet the requirement of residents and this is further reinforced by the applicant's desire to undertake a CPZ consultation.

7. Noise Report

We have reviewed the noise report and are concerned that the methodology is flawed and may have led to incorrect conclusions. Examining the noise readings they seemed unusual so we looked at the graph of readings which give a more continuous picture of noise through the observation period.

The chart for site MP1 showed readings as high as 100 Db although the average seemed to be around 65-70 Db.

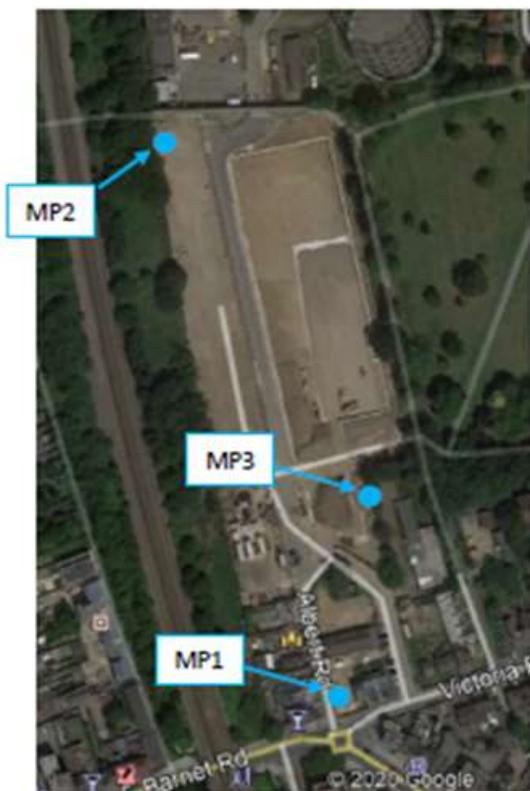
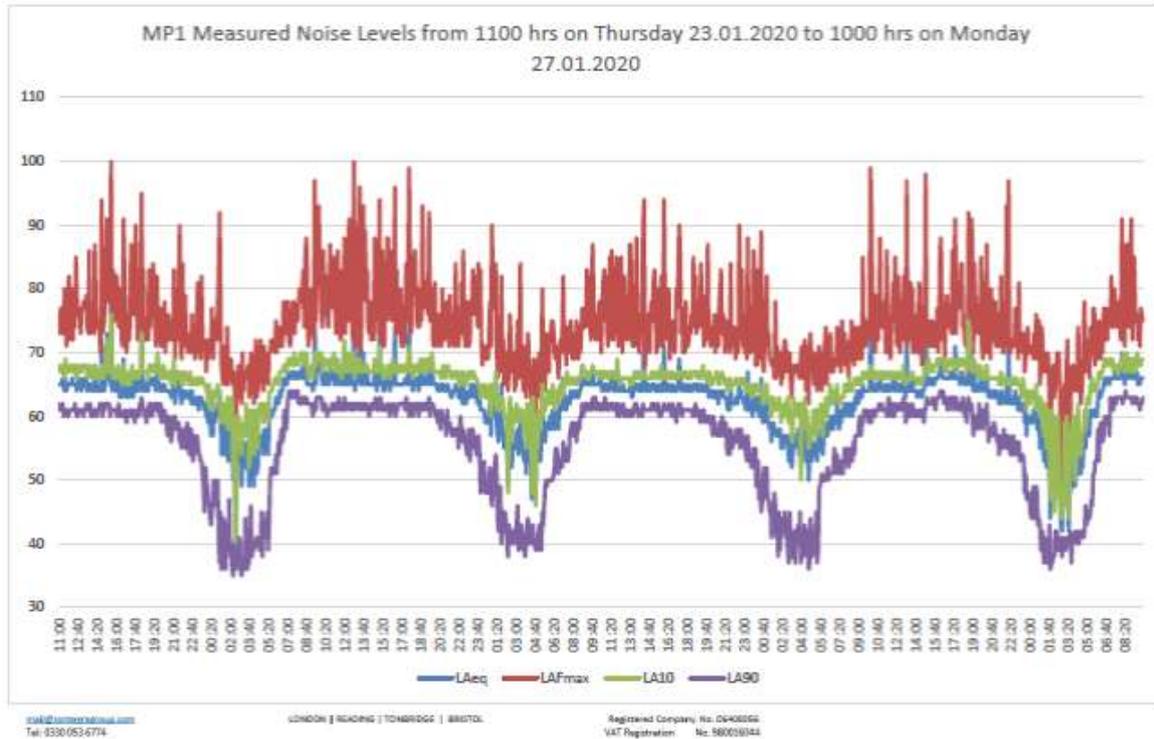


Figure 5.1: Noise Monitoring Locations

The report concludes that this is due to road noise from East Barnet Road and hence why they need to focus on the front blocks for noise insulation. The readings, taken at the back of the site, show quite modest noise levels, supporting their assumption that it is road noise. We then reviewed the location of the noise detectors. The MP1 detector at the front of the site was located “in a free-field location at a **height of 4.5m** on the corner of Albert Road and Victoria Way, approximately 10m from the junction of Victoria Way and the A110 East Barnet Road. MP1 was also approximately 14m from a plant area of The Railway Bell Public House, located on a first floor flat roof area adjacent to Albert Road. The position was chosen to capture road traffic noise levels at the worst affected part of the site, as well

Response to Planning Application 20/1719/FUL

as any plant and activity noise from The Railway Bell Public House”.

The MP2 detector is close to the railway line “located in a free-field location at a **height of 1.5m** approximately 5m back from the western boundary of the site (approximately 35m from the closest tracks of the railway line) and approximately 15m from the northern boundary of the site. The position was chosen to capture noise levels from the railway and any activity noise from the Albert Road Gas Works”.



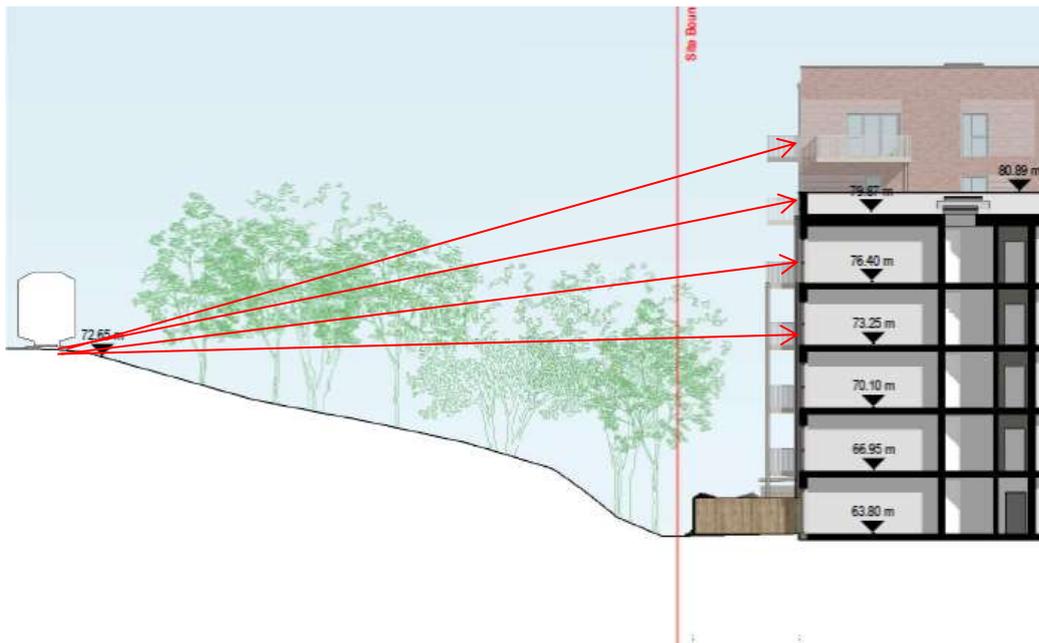
Critically, at that point on the site (which we have marked in red) there is a lot of foliage on the embankment, so at a height of 1.5m and close to the boundary where all the foliage is present, the detector would be effectively screened from railway noise.

By comparison the 4.5m height of the MP1 detector would expose it much more to the railway noise considering the bridge clearance is the same, 4.5 metres. Indeed, reviewing Rail Safety & Standards Board code of practice for measuring noise identifies the optimal height for sound measurement is 1.5m to 3.5m above the height of the rails, not above ground level.

The spikes of between 90 and 100 Db seem to come in regular patterns which would highly unusual to be generated from road noise. Trains pass through this stretch of track at up to 115 mph and, as such, the only

conclusion we can come to is that the noise spikes are created by passing trains.

Considering the height of the embankment and the height of the blocks which face the embankment, taking sound readings at 4.5m-9 metres (which appears to be the height difference between the ground and the top of the embankment) would have given a more realistic perspective of the noise experienced by flats especially in floors 4,5,6 & 7.



Response to Planning Application 20/1719/FUL

In some residential blocks that face a major railway line like this, elevations are often designed as blank facades, possibly with small windows for bathrooms or kitchens. An example of this is the flats adjacent to New Barnet Railway station.



This is possible if the corridor is single loaded. However, in the blocks facing the railway line, the corridors are double loaded and as such, there are 110 flats which contain habitable rooms facing the railway.

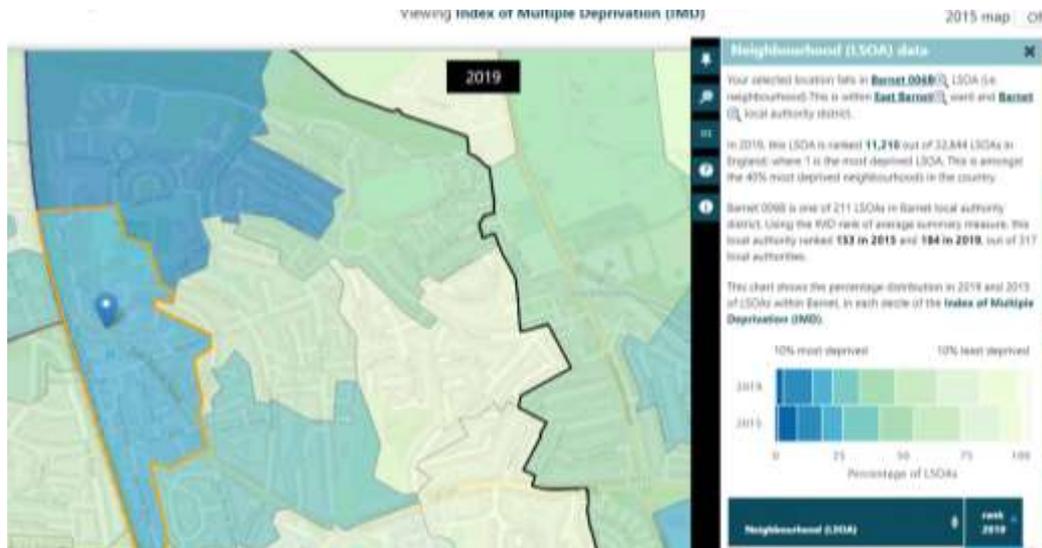
We would ask that the noise report is reviewed and noise measurements taken again at an appropriate height to ensure that a suitable noise mitigation strategy is developed.

Response to Planning Application 20/1719/FUL

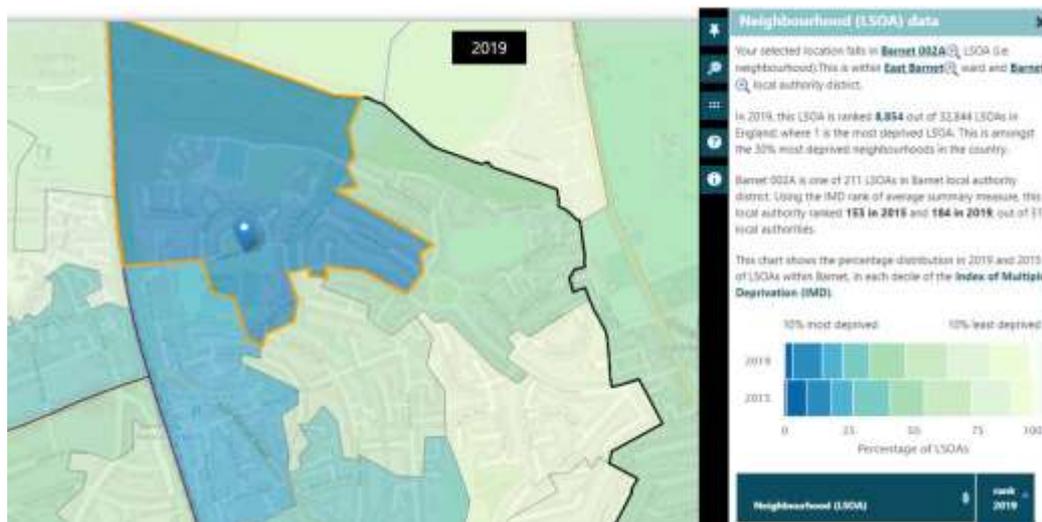
8. Health Assessment Report

8.1. Health Profile

The Health Assessment report states that “The site falls within the Barnet 006B LSOA, classed as falling within the 50% *least deprived* neighbourhood in the country in terms of health and disability”. However this does not concur with the map included in the report or the ONS statistics which states the site is in the 40% *most deprived* neighbourhoods in the country.



In addition, the adjacent Lower Layer Super Output Area (LSOA) Barnet 002a, which includes Westbrook Crescent, is in the 30% most deprived neighbourhoods in the country. We would also note that 38% of children at Livingstone Primary School, which would serve this site, attract the Pupil Premium, more than double the national average of 15.8%.



As such, the report’s assessment seems both inaccurate and misleading.

8.2. Nursery & School Places

The report uses the GLA Population yield calculator to identify the need for 137 nursery and childcare spaces for 0-4 year olds (174 if using an average PTAL of 2). The report notes that there are three nurseries in the local areas and that they do not provide data on available spaces.

Response to Planning Application 20/1719/FUL

However, it fails to draw any conclusion as to whether this need can be met. It then looks at primary school places identifying a requirement for 98 primary school places (120 if using an average PTAL of 2). The report glibly refers to a short section of a 2017 meeting report which states that there will be enough places locally until 2022/23 without recognising that this development is unlikely to be completed before 2023 and that within 2 miles of the site there will be a total 2,800 new homes coming on stream between 2021 and 2025. This will generate a requirement for approximately 590 0-4 year old places and 421 primary school places.

Without providing detailed information on childcare, nursery and primary school places in the immediate area it is reckless to state that requirement “can be accommodated in current facilities in the area”.

8.3. Housing Mix:

The assessment states: “The proposed mix includes 32% one-bedroom flats, 49% two bedroom flats and 19% three bedroom flats. By providing an *increased mix of housing*, this allows residents from the identified vulnerable groups – people with existing health issues and people in poor living conditions with a better choice in obtaining their desired dwelling that best meets their needs and could help to reduce overcrowding thus contributing positively to the lives of future residents. The provision of a mix of dwellings also creates mixed and socially inclusive communities which enables a sense of belonging and neighbourliness”.

This statement seems contradictory to the situation that exists. The scheme that has planning consent for this site has a significantly higher proportion of 3 and 4 bedroom homes (30% compared to 19%) including a number of houses which the new proposal has removed. The proposal completely ignores Barnet’s planning policy which states that:

Our dwelling size priorities are:

- i. For social rented housing – homes with 3 bedrooms are the highest priority***
- ii. For intermediate affordable housing – homes with 3/4 bedrooms are the highest priority***
- iii. For market housing – homes with 4 bedrooms are the highest priority, homes with 3 bedrooms are a medium priority”.***

As such the assessment seems, at best, disingenuous and at worst, untruthful.

8.4. Healthcare Provision

The report notes that there are three medical practices and three dentists in the local area. Two of the three medical practices are taking patients as are the three dental practices so the presumption is that they will be able to accommodate all of the 1395 new residents. Indeed, the assessment criteria asks: “Has the impact on healthcare services been addressed?” to which the response is yes and the impact is negligible. This seems reckless in the extreme to make such subjective and un-evidenced assumptions when the impact on local people could be immense.

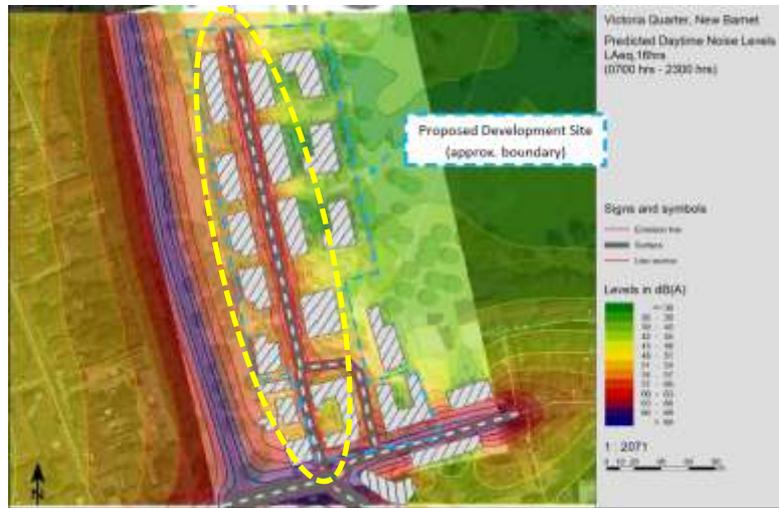
8.5. Open space

The assessment asks: “Does the proposal retain or replace existing open space and in areas of deficiency, provide new open or natural space, or improve access to existing spaces?” to which the response is: “Both the children’s play space and the communal amenity space will contribute positively to the health and well-being of residents”. This seems implausible given that the developer has failed to provide on-site play space for any children of 5 years and over and they openly acknowledge in their planning statement that they have failed to provide the required amenity space. As such the assessment is a false representation of the facts.

Response to Planning Application 20/1719/FUL

8.6. Noise

The statement copies the summary from the Noise report but fails to acknowledge that the noise chart shows significant noise along the spine road and in the flats facing the railway as set out below highlighted in yellow.



As such it seems strange that the Health Assessment states that “It can therefore be concluded that significant adverse impacts on the health or quality of life of those future residents would be avoided”.

8.7. Sunlight & Daylight

The assessment states that “each of the proposed units will meet all best practice and good quality requirements in respect of National Standards” and that “the *aims* of the BRE guidelines (2011) are achieved”. We are not sure what the ‘*aims*’ of the BRE guidelines are but we are clear that **30% of the rooms do not meet the BRE minimum recommendation for sunlight**, and that

8.8. Traffic Calming

The assessment states that “the proposal will not be providing any traffic calming measures”, yet the Spine Road includes both width restrictions and raised table measures to slow traffic. As such this statement is false.

8.9. Healthy Living

The assessment checklist asks: “Does the proposal provide dwellings with adequate internal space, including sufficient storage space *and separate kitchen and living spaces?*” The response states “*Kitchens and living spaces are separated in all flats*”. This is entirely untrue and a total misrepresentation of the facts given that only 5% (33 of the 652 flats) do have separate kitchen and living spaces and limited to 3 bed 5 person units in blocks E & F1. The only conclusion we can come to is that the author of the report never looked at the floor plans and simply made up the results.

8.10. Conclusion

This health assessment report is of such poor quality with so many inaccuracies and misleading statements that it is of no value and worse, could lead to the wrong conclusions being drawn. We would ask that this entire report is disregarded and request that the developer be required to produce a new and accurate report before this application is considered.

Response to Planning Application 20/1719/FUL

9. Design Review

9.1. Introduction

We have set out a detailed design review at Annex 1 which identifies a range of issues with the proposed design. The design review notes in summary:

“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”.

The specific issues are summarised below:

9.2. Height and Massing

- Monolithic, rectilinear massing of high rise blocks with lower sections read as ‘stuck-on’.
- Uniform and repetitive building typologies.
- Four buildings classified as tall.
- 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.
- Limiting effect of massing strategy giving rise to a significant shortfall in the private external space.

9.3. Breaches of Planning Policy

Local Plan Core Strategy (2012):

- the development fails to respect the local context.
- breaches Planning Policy CS5.

Local plan: Development Management Policies

- DM1: The development proposals are not based on an understanding of local characteristics and do not preserve or enhance local character and respect the appearance, scale, mass, height and pattern of surrounding buildings, spaces and streets.
- DM05: The four tall buildings are outside the strategic locations identified in the Core Strategy and should not be considered acceptable.

New Barnet Town Centre Framework:

- The development does not reflect the existing predominantly low level suburban context.
- Building heights are not appropriate to the wider suburban context.
- Council expectation of the highest standards of design in New Barnet which reflects the character of the surrounding suburban area have not been met.

9.4. Layout

- A generic grid overlaid on the site without reference to the surrounding context, resulting in uniform footprints and massing 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.
- Lack of permeability means views of the Recreation Ground are restricted to a minority of flats in blocks directly adjacent to it.

Response to Planning Application 20/1719/FUL

9.5. Noise

- Individual blocks allow train noise to penetrate the site.
- Total of 110 flats with habitable rooms directly face the railway, including 183 single aspect habitable rooms with 102 of these 110 flats allocated for affordable housing.
- 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.

9.6. Daylight and Sunlight

- Closely spaced, high rise blocks overshadow habitable rooms, particularly on lower floors.
- The daylight and sunlight report shows that many living/kitchen/dining rooms fall well below recommended daylighting levels, particularly on the lower floors in the middle row blocks.
- Distances between blocks are not dimensioned but appear likely to be well below 21 metres between blocks B1,C1 & D1 and blocks B2, C2 & D2, compromising privacy in habitable rooms.
- 30% of rooms do not meet BRE guidelines in achieving recommended level of sunlight.

9.7. External Space

- External spaces are dominated by the height and mass of the buildings. Landscaped areas are created in the incidental 'left over' spaces.
- Communal gardens are surrounded by tall buildings and consequently overshadowed.
- Overshadowing of play areas.
- Play space on site only for 0-4 year olds.

9.8. Housing Mix

- Fails to address Barnet's housing priority for family homes especially three and four bedrooms.
- 100% of the London Affordable Rent (LAR) housing has been located in flat blocks adjacent to the railway even though we were told the allocation would be 'tenure blind'.

9.9. Shared Circulation

- The majority of cores with eight flats per floor. Seven blocks accessed directly from double loaded, artificially lit corridors with long travel distances to staircases.
- Corridors in the majority of blocks are mechanically ventilated which will add to maintenance costs.
- These features increase the internal, 'short stay hotel' ambience, doing little to foster a sense of community.
- Blind corners in corridors and dead end spaces also increase the risk of anti-social behaviour.

9.10. Number of Dwellings Per Core

- 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.

9.11. Fire Safety

- Stay put policy advocated which may no longer be viable.
- 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 open plan 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'.

Response to Planning Application 20/1719/FUL

- This arrangement also makes the ingress of smoke into the communal escape route much more likely in the event of fire, blocking the sole escape route for residents.
- Some of these open plan flats, which do not comply with standard building regulations arrangements, are in Block A which is ten storeys high.
- The use of uPVC windows, which are flammable, have been implicated in the spread of flat fires including Lakanal House.

9.12. Elevation Materials and Finishes

- Detail design is limited to an attempt to relieve flat facades with a narrow range of features (soldier courses, change in brick colour or 25mm recesses).
- Elevations appear to have been considered as an afterthought rather than being integrated within the whole design process
- The implication of LBB comments made during pre-planning meetings is that the elevations are not satisfactory: *'Final elevations require further refinement'* (meeting 4)
- Utilitarian balconies feature without variation across the site. Balconies are metal. Windows, which look the same in elevation drawings are, in fact, uPVC.

10. Other Issues

10.1. Waste Water and SuDS

The foul water calculation for the site is estimated at 30 litres per second which equates to 108,000 litres per hour. It is not clear if Thames Water have confirmed the sewer capacity is sufficient to take another 108,000 litres per hour at this point in the sewer network especially as this area has been prone to sewer problems in the past. We also note that the sustainability report states that “Above-ground SuDS features could not be accommodated given the site topography and **proposed density**, and therefore below ground attenuation will be included.” This is yet another indicator of the over dense nature of this development.

10.2. Views

The Design and Access Statement states that the proximity to Victoria Recreation Ground allows the benefit of views over the park landscape. However unlike the previous scheme where almost all properties had views over the park this revised scheme prevents views to the park for all but 4 of the 12 main blocks (excluding the two blocks fronting Victoria Road).

10.3. Arboriculture

There is serious concern that the arboricultural survey lacks key details because it was carried out without the proposed drainage and services indicated on the proposed site layout (page 5). As such, if services do need to be installed within root protection areas then specialist techniques for their installation will be needed. This suggests this application has been rushed and any consent should be conditional on a proper arboricultural study being carried out.

10.4. Sustainability

The Sustainability Statement says the site is located in Islington and also references the Islington Emerging Plan. This undermines confidence that the correct analysis has been carried out.

10.5. Financial Viability Assessment

We note that no financial viability assessment has been published even though it is a requirement. The GLA have stated in their pre application advice that “Barnet Council will be expected to publish any financial viability assessment, submitted to support a planning application, in accordance with the Mayor's Affordable Housing and Viability SPG. GLA officers will ensure that the assessment is made available, to ensure transparency of information”. As such we would ask that this assessment is published before any decision is taken.

10.6. Climate Change

There is no mention about the **urban heat island effect** from this high density development affecting the space and amenity of spaces between the buildings. Summer temperatures in London are expected to escalate in the next 5-10 years with peaks being 6 degrees higher than current. As such, the urban realm needs to be designed accordingly.

10.7. Urban Greening Factor

Urban Greening Factor (UGF) is a benchmark promoted by the GLA to ensure that landscape is considered at the earliest stages in project development. There has been no landscape place making lead in developing the proposals and consequently they bear no relation to New Barnet and the wider townscape context. The green parts are very much the pocket spaces left over after optimising development footprint.