

These comments are on behalf of Friern Barnet & Whetstone Residents' Association (FBWRA).

Barnet House is clearly in need of redevelopment of some description. However the current proposals are not good enough and are largely a repackaging of the 2018 application that was refused by the Council. Accordingly, FBWRA objects to the current application.

The application, for 260 residential units, should be contrasted with the previous application, for 229 units (later cut to 216).

The specific reasons why we consider the current application should be refused are, in outline -

1 the low level of affordable housing units proposed- the proposal includes 32 "affordable" residential units ( 12 1/2 % - substantially less than the 20% offered in 2018 and far short of the 35 % Barnet's required by draft updated planning policies. The draft policies are relevant as they can be taken into account as "emerging planning policies". The strategic London Plan seeks overall 50% of new homes to be affordable. Barnet's current plan looks for 40% overall.

2. the mix of different sized units is inconsistent with Barnet policy- of the 260 flats proposed 52% would be 1-bedroomed, 35% 2-bedroomed and just 13% 3-bedroomed.

Barnet's updated policies assess the need for units of different sizes as 70% for 3 or more bedrooms for "market housing" ( on the developer's proposals 87% of the units will be "market housing"). 70% compared with 13%. For 1-bedroomed units Barnet's update looks for 6% (market) and 13% (affordable). The developer proposes 52%. 52% compared with 6%/13%.

3. the number of units- the large number of flats would result in an undue strain being placed on local services.

4. inadequate car parking- the developer says "The development is proposed to be car-lite, providing 58 car parking spaces inclusive of 11 disabled parking spaces and a further 5 motorcycle spaces. This provides a ratio of 0.22 spaces per residential unit when incorporating the motorcycle parking as required by the GLA."

The car parking provision is less than generous. It could be increased- in the Planning Statement the developer's agent admits "On this basis [ transport and planning policies], the range of car parking allowed for the proposed development is anything from 0-130 spaces."

The developer's survey of on-street parking within a 780m walk from Barnet House showed that "On the 13th July 2017, parking occupancy within nonrestricted areas was generally 100% from 0900-1400 before demand for parking dropped to 84% by 1600." So- essentially there was no available on-street parking during the daytime to accommodate additional cars. Yet there appears to be no analysis or evidence in the application documents to show 58 parking spaces will accommodate all vehicles of the residents of the property.

5. the "gated" nature of the proposal- the proposal is for a gated community with the main entrances within the enclosed internal space. The green spaces for the residents are within this

enclosure and on the roofs of the new block. The scheme is turning itself inward away from the surrounding community and not integrating or contributing to the wider community.

6. the placing of the proposed green space at the centre of the development – so no public benefit as largely hidden.

7. the height/mass of the proposed new build element adjacent to Baxendale- its excessive height, scale, massing and density would be over development and detrimental to the character and appearance of the area and detrimental to the visual amenity of adjoining residential occupiers.

8. poor waste management - inadequate waste storage in flats and residents of 83 units will have to walk more than the maximum allowed, (30m excluding lift distance) to dispose of rubbish.

9. overlooking – overlooking will be inevitable as there are facing habitable rooms less than 21m apart; blocks are too close together

10. poor internal design- too many units have been crammed into the shell of the existing building resulting in some unpleasant spaces. The central corridor approach results in single aspect dwellings.

11. inadequate light-the sunlight/daylight report shows some habitable rooms don't meet the minimum criteria. The proposal uses minimum criteria as a benchmark, rather than trying to give a good quality of life to residents and in some cases is not meeting even those minimum criteria. This therefore suggests the development is too dense.

12. inadequate ceiling height- the London Plan requires a minimum ceiling height of 2.5m in dwellings. The sections do not show if this is achieved

13. poor sustainability- the development only achieves a 63% BREEAM rating,so not achieving zero carbon. As this will be a requirement by 2050, or sooner, the development will likely need retrofitting to achieve this which is undesirable. The developer should be asked what it can do now to get to zero carbon.

Plans of the units show common areas and the internal kitchen, bathroom and corridor spaces will need additional lighting to make up for the shortfall in daylight, as will those habitable rooms that do not meet even the minimum daylight criteria. The lifts will require power to operate. Where will this energy come from? It is not clear from the reports whether the heat pumps mentioned will get enough power from the solar panels on the roof or do they merely supplement power from the grid. Additionally mechanical ventilation will be needed where natural ventilation is insufficient. All this adds to the power load and could be minimised with better planning.