

**Representations of:** Friern Barnet & Whetstone Residents' Association, 14 Bethune Avenue, Friern Barnet, London N11 3LE

**Planning Inspectorate appeal reference number:** APP/N5090/W/21/3289161

**Address of the appeal site:** Barnet House, 1255 High Road, London N20 0EJ

**These representations 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 2017 application that was refused. Accordingly, FBWRA requests that the appeal should be dismissed. We have prioritised our objections to focus on areas where FBWRA's concerns has necessitated researching the methodology used, for example, on parking but this is not to diminish our concerns subsequently stated with other aspects of the Application.

### **1. Preliminary comments – appellant's statement**

The paragraph numbers below follow those of the appellant's statement

*3.8 "The site is 350 metres from Totteridge and Whetstone Station, served by the Northern Line with a direct journey time of, for instance, 30 minutes to St Pancras International. Oakleigh Park Train Station is a 17-minute walk away with direct links to, for instance, London Kings Cross St Pancras. There are several bus stops within close proximity of the site (75m away). The site benefits from a Public Transport Accessibility Level (PTAL) rating of 4, however a manual calculation undertaken by the transport specialist suggests that this should be increased to 5."*

Comment- It is correct that the site has a PTAL of 4. There is no provision in the London Plan or the TfL PTAL toolkit for manual or other adjustment or massaging of PTAL ratings, and it is respectfully suggested that the Inquiry should wholly disregard the suggestion that the PTAL should be increased to 5.

A consequence of the PTAL being 4 and not 5 is that potentially a much larger number of on-site car parking spaces are permitted under the London Plan provisions and that there is no requirement for the site to be developed in a "car-lite" or "car-free" manner.

*-4.6 "Of interest locally, Northway House draws many parallels with the Site and planning permission was granted for the conversion of the office building to residential use on 25 July 2014 (LPA ref. B/05674/13), alongside extensions. A revised scheme was approved on 23 January 2015 (LPA ref. B/05378/14) which related to changes to the internal layout to maximise the use of space increasing the number of units to 148 compared to the originally approved 145. The affordable housing provision was increased to 7.4%."*

Comment- Northway House is certainly of interest and it is to be noted that the scheme has 171 on-site car parking spaces to serve the flats- a ratio of 1.15cps/flat. In spring 2021 FBWRA carried out a survey of the residents of Northway House and other recent residential conversions/developments in Whetstone to assess the adequacy of on-site parking provision (in the context of excess demand for on-street parking in the locality). The results for Northway House indicated that the on-site provision within that particular development was such that residents were unlikely to need to resort to on-street parking. We have no confidence that the situation at Barnet House would be similar.

With regard to the matters stated to comprise “common ground”-

*9.2.4 “Unit Mix – the mix of housing proposed through the application is appropriate in respect of the mix of 1, 2 and 3-bed units. The Site is well located in respect of public transport accessibility and local services and amenities, and is therefore very well suited to a predominantly smaller unit scheme, therefore complying with Policy H10 of the London Plan and emerging Policy HOU02 of the Local Plan Review.”*

Comment- the appellant’s choice of unit mix is probably substantially influenced by a desire for profit maximisation. It is well known that smaller units attract higher sales prices per square metre than do larger units. The supply of new homes in the locality of the site is predominantly of smaller units so there is relative undersupply of larger homes. We comment further on unit mix below.

*9.2.5 “Car and Cycle Parking – there are no issues with regard to the levels of car and cycle parking proposed through the scheme. The levels of car parking are within the maximum proposed through Policy T6 of the London Plan, whilst the quantity of cycle parking is in accordance with the minimum standards set through the London Plan.”*

Comment- We believe that inadequate consideration and analysis has been given to the issue of car parking and that the wrong conclusions have been reached. We return to this below.

*10.8 “The scheme therefore will significantly raise the standard of design most notably on site, but also tying into the recent regeneration the local area continues to experience. The existing building is an eye sore, in short, medium and long term views and the proposed replacement is of the highest quality of design. Therefore, significant weight should be given in support of the scheme as per Paragraph 134 of the NPPF.”*

Comment- 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 2017 application that was refused.

*10.9 “ Further weighing in favour of the application is the Council’s lack of five year housing land supply, as evidence in a recent appeal decision (APP/N5090/W/21/3271077) issued in September 2021 which noted LB Barnet could only demonstrate 4.7 years’ worth of supply (Appendix 8). The 2020 Housing Delivery Test also required LB Barnet to complete an Action Plan due to under-delivery. The Appellant proposes to produce evidence on this basis following updated 2021 Housing Delivery Test results published early next year.”*

Comment- we read the above appeal decision differently.

The Homebase decision is significant as it shows considerations of poor design and excessive visual impact (particularly of tall buildings) can outweigh the developers' arguments that a development should be permitted because it will provide "much needed homes" (housing supply considerations).

The Council's planning department recommended the application should be approved, even though existing local planning policies would arguably have justified refusal. The Councillors on the planning committee were brave enough to make up their own minds and refused the application – hence the appeal.

We understand that this is one of the first appeal decisions to highlight the increased importance given to the consideration of design by recent changes in national planning policies (the "National Planning Policy Framework" and the government's "National Design Guide"). In the words of the Inspector these changes "*further place emphasis on granting permission for well-designed buildings and refusing it for poor quality schemes*". In his decision he concluded that it "*has not been shown that the appeal scheme meets these important criteria which support one of the overarching objectives of the NPPF which is to foster well-designed, beautiful and safe places*".

10.10.6 *"The scheme will generate significant financial contributions through Community Infrastructure Levy and Section 106 payments."*

Comment- we question whether this is actually a relevant planning consideration.

Appendix 5, Table 2 Impact on Local Infrastructure

*"Whilst limited capacity was identified at local GP surgeries, this will likely be addressed through mandatory local Community Infrastructure Levy payments. Impacts on local nurseries and wider community facilities will also be addressed through local Community Infrastructure Levy payments, as identified in Barnet's annual infrastructure funding statement."*

Comment- Note the statement "Whilst limited capacity was identified at local GP surgeries, this will likely be addressed through mandatory local Community Infrastructure Levy payments." We believe that this statement exhibits a misunderstanding of how CIL monies are allocated by the Council- they are not hypothecated to the area in which a contributing scheme is located. Our understanding is that currently Barnet's CIL spending is heavily skewed to locations in the west of the Borough, rather than to areas such as Whetstone, lying in the east. Further, the provision of GP surgeries is not a responsibility of the local authority.

However, we note and welcome the news of the proposal that NHS North Central London Clinical Commissioning Group should be granted first refusal on all the commercial space within the development but also recognise that a right of first refusal is not a binding commitment to occupy

the space and that there is therefore no guarantee that it would ever be brought into use as a community medical facility.

Accordingly we request that if the appeal is allowed there should be a “firming up” of the arrangement, to incentivise the appellant to ensure that such medical facility use does actually materialise. We suggest that this might take the form of a planning condition, or provision is a s. 106 agreement which would prohibit a substantial proportion of the residential units to be comprised in the development from being brought into use until either the commercial space was brought into use as a community medical facility or an equivalent amount of new floorspace at another location within a prescribed distance (perhaps 500m) from the appeal site was brought in to such use.

The justification for the above would be that as there is clearly identified limited capacity at local GP surgeries it would be inappropriate for all the residential accommodation at the appeal site to be brought into use until that capacity limitation had been remedied. It might well be that case that in practise such an arrangement would not cause any issues for the appellant because it might in any event plan to release units in the development into the market in phases in order to achieve higher selling prices than might be achieved if all units were released at once.

## **2. Reasons the appeal should be refused**

We believe that there are a number of reasons why the appeal should be refused. From FBWRA’s perspective, because of the potential impact of the issue on our members and local residents who either live in the area around the appeal site or who need to park in that area when visiting Whetstone town centre, one of the most important issues is the very low level of on-site parking provision proposed by the appellant. For this reason we would like to deal with this particular issue before turning to others. We appreciate that others who object may have a different prioritisation for their own objections.

### **2.1 Inadequate car parking-**

As demonstrated by the content of the numerous public comments, the proposed level of on-site car parking provision is a matter of great concern to many members of the public.

The appellant 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 appellant’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 appellant’s survey of on-street parking within a 780m walk from Barnet House showed that *“On the 13th July 2017, parking occupancy within non-restricted 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. The analysis in the

Transport Assessment included in the application documents shows that the 58 parking spaces proposed will not accommodate all vehicles of the residents of the property – vehicle ownership is anticipated to be 106 in number so there would be overspill parking in the region of 48 vehicles to be accommodated in neighbouring streets (see pages 110- 112,, Velocity Transport Assessment, May 2021)

### **2.1.1 Parking Survey Methodology**

Although the parking survey was repeated in 2021 the methodology used (in both surveys) is questionable

We have some specific questions for the Council and also for the appellant in relation to the applicant's parking survey, which we would like the Inquiry to raise-

A. In assessing parking availability what allowance has been made for additional local parking demand generated by consented developments (including conversion) not yet under construction and for other reasonably anticipated future developments?

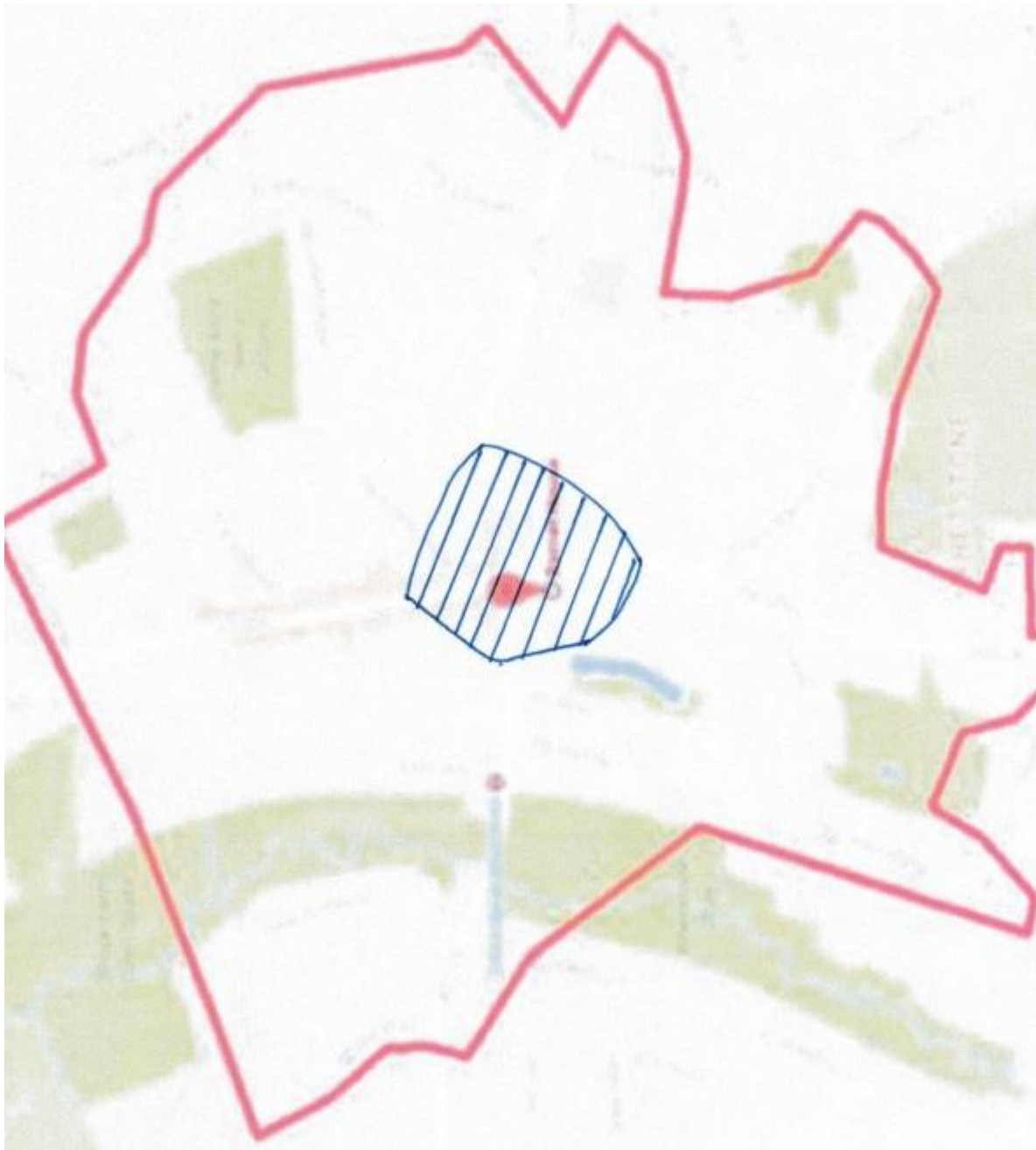
B. Both the 2017 and 2021 parking surveys examined parking availability within a 10-minute walk of Barnet House (780m). However, in May 2021 Barnet Council informed us ( response to Freedom of Information request no. 7290932 that “ *The Lambeth Methodology [ a method of assessing on – street parking availability] is the preferred and most appropriate method used to assess the level of on street parking availability surrounding an application site. This is not mentioned in the [parking] policy but is the most commonly used by transport consultants within Barnet and is recommended by highway officers.*”

The Lambeth Methodology is that for residential developments the survey area “*generally covers an area of 200m (or a 2 minute walk) around a site.*” So, why did the 2017 and 2022 parking surveys cover parking availability within a 10-minute walk of Barnet House- an area approximately 25 times bigger- and a bigger area will inevitably throw up more parking places!

Why is there a departure from the standard methodology? We have reviewed other parking surveys provided to the Council in recent years and have not found any other cases where the survey area was extended beyond the 2 minute walk distance contemplated by the Lambeth methodology. What were the apparently unique circumstances that justified a 25 fold increase in the extent of the parking survey area – in 2017 (the original survey) - the explanation given for the same treatment for the 2021 survey was “consistency.”

We were informed by the Council that the case officer for the 2021 application advised that he had no information as to the reason for the agreement of the 10-minute walk survey pattern in 2017. In 2021 the same methodology was agreed by the Council seemingly without giving consideration for the reasoning behind its original adoption.

Our Plan 1 (below) is a copy of a plan provided to us by the Council showing the agreed parking survey area (10minute walk) bounded by a red line. We have added, edged and hatched blue, our estimate of the extent of a 2-minute walk survey area as contemplated by the Lambeth Methodology. Clearly- bigger area- more parking spaces- easier to argue adequate parking availability. Why was this agreed?



*Plan 1- 10 minute walk parking survey area (red edging) an 2 minute walk area (edged and hatched blue)*

Further, the parking survey methodology was to provide street by street figures which were then aggregated to give figures for the whole survey area. Surely a better methodology would have been to provide separate figures for the area within the 200m Lambeth model area and separate figures for successively more distant bands (200-400m, etc)? That would have enabled a more granular examination on the impact of overspill parking from the development on to individual roads so that the impact on the amenity of the residents of those roads and on visitors to the area seeking to park in those roads could be assessed, rather than being buried in data for a much larger (and seemingly unusually larger) survey area.

As the appellant was the applicant in both 2017 and 2021 it (or its consultants) will presumably be able to answer the above even if the Council is unable to do so.

### **2.1.2 Car parking - analysis**

The appellant's Planning Statement 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. In addition, the proposed development will offer one car club space and one disabled car parking space for commercial use) on Baxendale. The scheme will deliver 482 cycle parking spaces including 12 for the workspace and 7 visitor spaces within the public realm."*

The car parking provision seems to be less than generous. Seemingly it could be increased- on page 25 of the Planning Statement it is admitted by the appellant's agent that *"On this basis [applicable transport and planning policies], the range of car parking allowed for the proposed development is anything from 0-130 spaces."*

Mayoral and Council policies are set to discourage ownership of cars. That is a political choice. The appellant's own consultants (Velocity Transport Planning Ltd) carried out a parking survey covering on-street parking within a 780m walk from Barnet House the results of which (contained in the "Car Park Design and Management Plan") were 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."* (para 2.4.4). So- essentially there was no available on-street parking during the daytime to accommodate additional cars.

The parking survey was repeated in September 2021. The results were submitted to the Council under cover of a letter dated 10 November 2021, which stated *"This provides further comfort that the current demand for street car parking spaces remains as was recorded in 2017 and any relative changes are not significant in the context of overall capacity. The data clearly shows that the area has a significant amount of residual parking capacity through both overnight and daytime periods."*

So- if demand for street parking was essentially unchanged from 2017, when *" parking occupancy within nonrestricted areas was generally 100% from 0900-1400 before demand for parking dropped to 84% by 1600"*, how can there be a significant amount of residual parking capacity through the daytime period? It is daytime parking which is the issue in this location, not overnight parking.

The significance of daytime parking availability is that in the daytime the needs of visitors need to be accommodated. If capacity is pre-empted by residents (many of whom will not use their vehicles to commute) so that if parked on-street they may well sterilise parking spaces for the whole day.

Even where the 2021 survey shows capacity to exist (because Barnet House is unoccupied), when it is brought back into use vehicles associated with Barnet House will once again come into the equation. Further, the survey was carried out in September 2021, and, as Velocity noted in their comments, in part the available unused capacity was to be attributed to reduced commuter parking. Of course, even in September 2021 passenger traffic on the London Underground was still greatly reduced compared to pre-pandemic levels and so the “unused capacity” may well prove to be a temporary phenomenon- accordingly we suggest that the planning Officer’s conclusions on parking as set out in the Officer’s Report to the Strategic Planning Committee are of questionable validity.

The issue about car parking provision is that compliance with the policies on on-site car parking provision (set to discourage ownership of cars) is one side of a coin. The other side of that coin is that if the on-site provision is inadequate to actually accommodate the reasonably anticipated number of cars associated with the development the consequent overflow parking onto local streets is likely to be materially detrimental to the amenity (availability of on-street parking) for exiting local residents and visitors to the locality, and such material detriment is a valid reason for refusing the application. The appellant’s own parking survey clearly shows that there is inadequate space in the locality for overflow parking- that is what “100% occupancy” means and we suggest that if the 2021 parking data was represented in a more “granular “ manner ( see our suggestion on this above) a very different picture would emerge for some roads in close proximity to the appeal site.

### **2.3 Further reasons why the appeal should be refused**

The further reasons why we consider the appeal should be refused are, in outline -

**2.3.1** 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 2017 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.

**2.3.2** the mix of different sized units is inconsistent with Barnet policy- of the 260 flats proposed 52% would be studio/ 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 appellant’s proposals 87% of the units will be “market housing”). 70% 3 + bedrooms compared with 13%. For 1-bedroomed units Barnet’s update looks for 6% (market) and 13% (affordable). The appellant proposes 52%. 52% compared with 6%/13%.

It should be noted that unit mix policy should be applied at the individual development level, not on a “borough wide” level.

We are told by the appellant in its statement that there is “common ground” on the issue of unit mix. If that is the case the disparities are sufficiently great as to almost suggest that the Council has abandoned any attempt to enforce its policies on unit mix.



**2.3.3** the number of units- the large number of flats would result in an undue strain being placed on local services. This is actually admitted by the appellant in relation to doctors surgery facilities – see “Impact on Local Infrastructure” above.

**2.3.4** 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.

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

**2.3.6** 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.

**2.3.7** 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.

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

**2.3.9** 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.

**2.3.10** 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.

**2.3.11** 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

**2.3.12** 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 appellant 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.

We comment on certain aspects of the application in greater detail below-

## **2.4. Further detailed comments on reasons for refusal**

### **2.4.1 – detailed design representations**

The National Design Guide C1 paragraph 42 asks that 'well designed new development is integrated into its wider surroundings, physically, socially and visually'.

The proposal is for a gated community with the main entrances to the blocks, and therefore to the homes, within the enclosed internal space. Similarly, the green spaces for private residences are within this enclosure and on the roofs of the new block. This scheme therefore is turning itself inward away from the surrounding community and not integrating or contributing to the wider community.

Entrance to the whole development appears to be via the South Gate on Baxendale Avenue. It is expected that the concierge scheme (operating between 9-5 only) will deal with deliveries to flats, manage the waste collection and servicing of the dwelling. The main entrance therefore to people's homes are tucked away. Elevation pl05 105 shows a very small entrance, no sense of arrival or expression of the entrance. The opportunity to access homes in Barnet House from the High Road has not been taken thus missing an opportunity.

Notoriously windy the wind report shows that mitigation levels are required at the ground floor, north east corner of the courtyard, seating locations at the north end of terrace level amenity space. Additionally 3 locations with strong winds exceeding the safety threshold and requiring mitigation.

Mitigation measures include proposed landscaping, 2.4m high porous security fence from NW corner of Barnet house to the site boundary, and 2m high hedges. As these mitigation measures include landscaping and hedges, it is imperative that these are fully matured sized and grown at occupation and not subjected to reduction in specification during project development and the construction work. This must be conditioned.

The waste management strategy seems ambitious. It is recognised that for some residents they will have to walk further than the maximum allowed, 30m excluding lift distance. Rubbish is stored on bins in their home then transported to the lift and down to a waste disposal point. This assumes that they will have the ability to be able to do this, and the willingness. 83 units exceed the distance.

The flat plans do not appear to show where the waste storage is kept. The WMP states that this will take up a whole kitchen unit min width 500mm wide. The kitchens are minimal and in most cases integral to the living space. Looking at the flat layouts in some cases there does not appear to be sufficient space for these.

Overlooking will be inevitable where there are facing habitable rooms less than 21m apart, blocks are too close together.

Looking at the flat plans. London Plan D6 is clear that single aspect flats are to be the exception. There are quite a number of these. To achieve a dual aspect in some cases, in particular the 2 flats at the centre of Barnet House the layout is particularly tortuous. Very minimal external wall with a dark and underlit interior with the kitchen as a corridor, dangerous particularly in the wheelchair flat. The plan might meet the space standards in terms of sq. metres but the layout is poor. Essentially too many units have been crammed into the shell of the existing building resulting in some particularly unpleasant spaces. The floor plan of the building has been extended to allow for a central corridor approach with the inevitable introduction of single aspect dwellings.

Daylight, sunlight, fresh air and good ventilation, and access to private external space are all now understood to be essential to healthy living. The sunlight and daylight report shows that a number of habitable rooms in the new development will not meet the minimum criteria required. It should be remembered that these are minimum criteria and in reality the aim should be to exceed these in all cases. Some of these are explained by the provision of balconies which is restricting daylight and sunlight. As both are essential it should not be acceptable for one to compromise the other.

The proposal is using minimum criteria as a benchmark, rather than trying to give a good quality of life to residents and is not meeting even those minimum criteria in some cases. This therefore points to the fact that the development is over dense.

The London Plan requires a minimum ceiling height of 2.5m in the dwellings. The sections do not show whether this is achieved. The servicing for the building is not indicated, but one might assume that to achieve the ducting required for a heating, heat recovery and ventilating system, plus the flooring required to achieve sound reduction between flats for air and structure borne, the floor thickness shown could be undersized. Although this technically might be a Building Control issue, it will be too late once planning is granted if compromises have to be made as the technical design is developed to the detriment of the proposal.

Although environmentally it is good to see Barnet House reused in terms of the overall crisis that we are facing this development is underachieving. The whole development is only achieving a BREEAM rating of 63% so not achieving zero carbon. As this will be a requirement by 2050, or sooner than that in all probability, the development will likely need a degree of retrofitting to achieve this which is undesirable. The appellant should be asked now what they might need to do to achieve zero carbon, and how this will be achieved. The plans of the units show clearly that for common areas and the internal kitchen, bathroom and corridor spaces will all require 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 ASHP and WHP mentioned will get enough power from the solar panels on the roof of Barnet House or is this merely supplementing power from the grid. Additionally mechanical ventilation will be required where natural ventilation is insufficient. All of this adds to the power load and could be minimised with better planning.

## 2.4.2 – further issues

### A. Revision of 2017 refused plan:

The 2017 application was rejected on the following grounds (Design and Access Statement 2.12):

- > Reason 1: Height, Scale, Massing and Density as ‘excessive’ and;
- > Reason 2: Quantum of development putting strain on local services.

The appellant claims to address these.

Yet:

- > 1. The profile of the new design differs little from that of 2017 (4.2.1). Have they done anything to address Reason 1 for the previous refusal?
- > 2. The number of flats is now 260, up from 216 in 2017. Does this address Reason 2?

### B. Exterior space / play space

The exterior space overall is inadequate for 260 homes. Moreover, it is unpleasantly fragmented and constrained. Play areas, as required by regulations, take up about half of the open areas. At least half of the external area is located on the roof of the buildings. The results are:

1. Exceptionally fragmented and small open communal areas which are not dedicated to play,
2. Location of about half of the playing space on the roof, which is hardly ideal (large peripheral barriers will be required for safety creating an unpleasant enclosed effect in a narrow space for children).

After subtracting the play space, the amount of dedicated open space available for each adult is minimal. By cramming so much building onto the site the appellants have left far too little for open space (much of which has been moved to the roof).

The outside space does not meet the standards in the London Plan:

London Plan Policy D6 (see extract from Table 3.2 below) sets out the Mayor’s expectations with regard to the design quality of outside space:

*“Outside space iv*

*Communal outside amenity spaces should:*

- > provide sufficient space to meet the requirements of the number of residents (an analysis would show this is questionable in this case - a tiny amount of space in fragmented form per resident)*
- > be designed to be easily accessed from all related dwellings (anything on the roof is not easily accessed from all dwellings - people will need to move between buildings then climb to the roof - what about disabled access to the roof?)*

*> be located to be appreciated from the inside (a roof cannot be appreciated from the inside - by definition)*

*> be positioned to allow overlooking (a roof cannot usually be effectively overlooked)*

*> be designed to support an appropriate balance of informal social activity and play opportunities for various age groups (the balance in this case, for better or worse, favours the children because only their space is prescribed. With so many studios and one bedroom flats the number of children may be below expectations leaving children with a lot of space but adults overcrowded in their own little areas).*

*> meet the changing and diverse needs of different occupiers (previous comments apply)."*

Play areas for children of the same age-bands is divided between the courtyard on the ground level and the roof. This will encourage children to run between these two locations, which is unsafe. Children's play areas should all be on a ground level, to permit easy inter-mixing of all children and allow games requiring space to run. Splitting the play areas may encourage development of different groups (the "roof" and the "courtyard" - with rivalry according to the equipment provided and the weather conditions (sunnier on the roof/more protected in the courtyard). Finally, can children really be expected never to play ball games or Frisbee on the roof (with the ball flying over any but the highest barriers?).

### **C. Design Life of Reinforced Concrete and Refurbishment of Barnet House for Residential Use**

There are concerns that modernist reinforced concrete buildings become prone to failure after 60 years. This is due to corrosion of the metal embedded in the concrete, primarily reinforcing steel. The quality of construction of the original Eveready House in 1966 is probably uncertain by now. The appellants assume that the basic concrete structure of Barnet House can be reused safely to last for another 60 years. By this time, the original Barnet house reinforced concrete will be 115 years old. There are currently no buildings of this type that can serve as examples of what happens to a medium quality building such as Barnet House after 115 years (structures built before 1906 were of a different type). The appellants should be required to prove beyond a reasonable doubt that the probability of failure of the old Barnet House structure over the next 60 years is negligible.

Reuse of old buildings can lead to some energy savings, since the structure does not have to be rebuilt. In this case these savings are likely to be modest, because: (a) the extent of the refurbishment is massive, requiring construction of a whole new exterior and upper layer, and (b) the building can never be as well insulated and efficient as an optimized new-build structure. Moreover, the architects have had to make considerable compromises in designing the flats within the existing Barnet House, which was built for offices. A new building would allow much higher quality accommodation, with more light, external space (better balconies), improved services (including plumbing/ventilation/air conditioning) and amenities (lobby spaces etc.). Moreover, there is a significant risk that due to the problem of reinforced concrete, the "new" Barnet House will have to be greatly refurbished (i.e. abandoned for some time) or demolished before its projected life of 60 years. A new building can be guaranteed to last beyond that horizon.

#### **D. Whole Life-cycle Carbon Assessment**

This Assessment shows a huge carbon benefit (reduction in net CO<sub>2</sub> emissions) from recycling of materials at the end of the project life. In the base case (Table 4.3), total emissions during the life of the building (Stages A-C from construction through demolition) are 36,681 tons CO<sub>2</sub>e, and the carbon savings at the end of the building's life (stage D) are 9,636 tons CO<sub>2</sub>e.

According to the appellants, the benefits (negative emissions) in stage D "include emission benefits from recycling recyclable building materials. Benefits for re-used or recycled material types include positive impact of replacing virgin-based material with recycled material and benefits for materials that can be recovered for energy cover positive impact for replacing other energy streams based on average impacts of energy production." It is assumed that almost all parts of the building can be recycled to some extent. However, a very large part of the material is embodied in the existing Barnet House, which is already 55 years old. The assumed building life in the Assessment is 60 years, so the assumption is that around 2087 (assuming the project is finished in 2027), most of the materials from the existing Barnet House will be recycled. These materials will by then be 115 years old. Can all of them really meet anticipated needs for recycling in 2087 - will they not be of obsolete quality and beyond salvage?

There appears to be a methodological flaw in the calculations of the savings at Stage D: The Decarbonisation scenario assumes that energy used in 2087 will be carbon free (or almost so). Therefore, production of materials in 2087 in the decarbonisation scenario will emit much less CO<sub>2</sub> than in the base scenario. This means that recycling will save correspondingly less energy. For example, if today producing 1 ton of steel from iron ore emits 1.85 tons CO<sub>2</sub>, and producing 1 ton of steel from recycled steel emits 0.4 tons of CO<sub>2</sub>, then each ton of steel recycled saves 1.45 tons of CO<sub>2</sub>. However, in a decarbonisation scenario all energy is renewable and steel processes are carbon free. Hence recycling a ton of steel saves no CO<sub>2</sub> (i.e. in 2087 producing a ton of steel from iron ore emits 0 tons CO<sub>2</sub> and from recycled steel also 0 tons CO<sub>2</sub>). Hence the CO<sub>2</sub>e benefits shown for Stage D in the Decarbonisation scenario should be much lower than those in the base scenario (indeed they could be close to zero).

To summarize in relation to the further issues above :

- a. The appellants have done nothing to address the reasons for the refusal of the 2017 proposal,
- b. The provisions for exterior space and play space are grossly inadequate,
- c. The appellant should prove that the existing reinforced concrete structure of Barnet House, which will be used in the new development, can last a further 60 years (as planned),
- d. It is questionable whether the reuse of the existing building is the best option for energy use, architectural design, and residential quality,
- c. There appear to be methodological problems with the Whole Life-Cycle Carbon Assessment.

### **3. Conclusion.**

As we stated at the outset, Barnet House is clearly in need of redevelopment of some description. However the current proposals are not good enough. Accordingly we respectfully request that the appeal should be dismissed.

Friern Barnet & Whetstone Residents' Association

06 March 2022