



Hardeep Ryatt BA (Hons) DipTP MRTPI  
Principal Planner  
Major Projects Team  
Planning & Building Control  
2 Bristol Avenue  
London NW9 4EW

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Dear Hardeep Ryatt,

**VICTORIA QUARTER, NEW BARNET – 20/1719/FUL  
(Land formerly known as British Gas Works, Albert Road EN4 9SH)**

I am writing on behalf of the Barnet Society to object to this application. This follows a consultation of our membership, of whom some 10% responded, many in some detail and all objecting to the scheme.

If approved, Victoria Quarter would be the biggest development in the environs of Chipping Barnet for over half a century. It would introduce substantially more dwellings than in all the converted office blocks in Station Road, and more than twice as many as Transport for London's proposed High Barnet Station development.

The Barnet Society seeks to engage constructively with development proposals in and around Chipping Barnet. We accept the principles of redevelopment of brownfield land and higher density near transport hubs, where appropriate. We would welcome more housing in the area, especially more family – and genuinely affordable – homes with gardens.

We supported the previously approved scheme for the Victoria Quarter, which was for 305 dwellings, with a further 66 agreed in principle but not yet with secured permissions: a total of 371 homes. That scheme was contentious locally but, after a long design and consultation process, achieved consent for the main part of the site, satisfying a number of local needs and concerns in the process. One notable feature was the inclusion of a terraced family houses with gardens, a much-needed type of dwelling well-suited to the suburban context. This current proposal, by contrast, is a poor response to the needs and context of the area. It is a massive overdevelopment of the site and is not a design of quality. It fails on all the key criteria.

Our reasons for objecting to the planning application are as follows:

- **Over-development** – The developers plan to build 652 flats, 281 (76%) more than the 371 already agreed. This means that they will build bigger and taller blocks, increase the proportion of smaller units, and fail to provide any homes with gardens.
- **Density** – The proposal would entail an overall density of 215 units per hectare and 625 habitable rooms per hectare. These are densities entirely without precedent in New Barnet or Chipping Barnet and two to three times the allowable levels set out in the London Plan for developments in suburban areas with a low to mid-range PTAL rating. Greater densities are reserved for sites in the urban core with good or excellent

transport links. To build in this way in New Barnet would be a gross infringement of the express intention and spirit of the planning system in London.

- **Bulk and massing** – 14 blocks of between 4 and 10 storeys are proposed on a site slightly over three hectares. Such a closely-packed and high-rise cluster will give an inner-city feel out of keeping with the edge of London location. Given that the Green Belt is 450m away, this will make the edge of New Barnet like a fortress rather than a predominantly low-rise and permeable fringe. Any development in such a sensitive liminal location should avoid a jarring and prominent statement of its presence. It should hug the landscape as achieved, for example, by the JCoSS buildings nearby.
- **Height** – Four of the blocks exceed Barnet's policy for tall buildings. The site is not in any of the handful of locations where blocks taller than eight stories are allowed. One of the tests for tall buildings set by Barnet Council is that they should only be allowed if they can be successfully integrated into the existing urban fabric. The justification put forward here is that Victoria Quarter would stand well away from existing properties (even though the drawings rely on the proximity of the gasholder and the blocks of flats on higher ground in Station Road as reference points in the skyline). This fails the test of successful integration. The result would be a high rise island on the edge of New Barnet. This is not the landmark we want.

The development will appear dominant from Victoria Recreation Ground and cannot be fully screened as it will be taller than the mature trees at the edge of the park. There is no assessment of the impact on the playing fields on the western side of the Recreation Ground, which are likely to be overshadowed on winter afternoons.

We note that the air source heat pump enclosures on the roofs of Blocks G & J will add a full storey to their height, as would water tanks for sprinklers.

No adequate wind testing seems to have been carried out to determine if mitigation is needed to protect pedestrians at street level from high wind speeds caused by the tall closely packed buildings, as would normally be required in a full Environmental Impact Assessment.

- **Character, design and response to context** – This scheme is an urban formula applied to a suburban site, not a response to context or local character. Despite assertions to the contrary in the submission, the response to the context or locality in terms of form or architecture is nowhere adequately articulated. The truth is that the proposals owe nothing to their context. For example, the D&A statement refers to Edwardian (late Classical) mansion blocks as a source typology but that is not a local form and, in any case, the proposals do not derive from this form since the buildings on offer are essentially large modern-movement inspired blocks with some brickwork variation and balconies. None of the proportions or detailing – whatever the D&A says – can be said to be Classical. What we do get is anonymous, indistinct, monotonous – unashamedly the same as the developers' other schemes across London (as the photographs in their publicity and D&A statement indicate). Neither is there any response to the edge of Green Belt location, where we might hope to see the harshness of the junction between town and country softened and elided in the form and massing and in the landscaping treatment. Rather, the development ignores its setting to the north. As a whole, it is inward-looking and forbidding. Because of its poor connectivity to existing streets to east, north and west, the estate will be in effect a large cul-de-sac, discouraging neighbours from passing through it and thereby reducing informal surveillance and sense of security.
- **Housing mix** – 81% of the homes proposed are 1-2 bedroom flats, not the 3-4 bedroom homes which are needed locally, as clearly identified in Barnet's planning policy. This is a missed opportunity given that there are so few sites in the area large enough to make a decisive contribution to the borough's need for larger family houses. Less than a third of the flats (209) are described as affordable.
- **Parking** – 392 parking spaces are proposed, an unnecessarily large number for a site so close to a railway station. There is no plan to limit car-ownership by tenure and so

there will be increased demand on the very limited supply of unrestricted parking nearby. Only 4 car club spaces will be provided.

- **Traffic** – The substantial increase in residents and car-use will put additional pressure on an already strained network of streets. In particular, the mini-roundabout at the main exit of the site is already operating over capacity. Vehicle circulation in the site will be poor because of the effective dead-end of the main route. The developer's assertion that 'the development will not introduce additional vehicle trips over and above those already approved through the previous scheme' (PS 7.54) is not credible.
- **Cycling** – Storage is inconveniently located at the northern end of the site. Cyclists should be given greater priority along Albert Road West and at the Victoria Road junction. The welcome proposal to improve access to the railway subway should recognise the differing needs of cyclists, pedestrians and the disabled.
- **Impact on local services** – 652 dwellings will put greater pressure on local medical and dental practices, schools and other services, yet all that is provided for the community is a kiosk. We support the more detailed objections made in this regard by New Barnet Community Association and Theresa Villers MP.
- **Views** – In addition to dominating Victoria Recreation Ground, the development will be visible from East Barnet Road, Victoria Road, Park Road, the Bevan Estate and from across the railway line, especially from Tudor Park (none of which are shown in the developers' visualisations). Neither Tudor Park, Monken Hadley Common nor Hadley Woods are included in the analysis of local green areas. The impact of the cluster of large blocks on views to and from the Green Belt is not assessed. The protected view from Hadley Common towards central London will be compromised.
- **Indoor space** – The design provides cramped and poor-quality domestic environments. We are particularly concerned that only 5% of the dwellings have a kitchen separate to the living space. Several of the flats will have poor light quality because of the proximity of the adjacent blocks. We share the concerns raised by NBCA's *Appraisal of Design Proposals*, which draws attention to many flaws in the design of the flats.
- **Outdoor space** – The development falls a long way short (by 40%) of the required amount of private outdoor amenity space and has to make up for it by creating communal space and relying on the existing amenity space provided by Victoria Recreation Ground. Nothing could demonstrate the necessity for private outdoor space more than the present lockdown for COVID-19. A number of the communal outdoor spaces will be severely overshadowed, owing to the proximity of adjacent blocks.
- **Energy use** – Communal air source heat pumps are proposed with substantial rooftop technical areas on blocks G & J, but the noise impact of these is not considered.
- **Sustainability** – Although the scheme claims to be zero-carbon, we note that this would only be achieved by making a carbon-offset payment of nearly £500,000. There are only fleeting and generalised references to embodied carbon, and no aspiration to a circular economy.
- **Fire** – The fire strategy takes no account of the May 2020 amendments to the Building Regulations Part B, which now require all buildings over 11 metres high to have sprinklers. This is likely to require water tanks on the roofs of the blocks, adding further to their height.
- **Management** – No evidence is provided to assure us that the buildings and landscape will be managed and maintained adequately in the long term. Given the preponderance of social and low/middle income housing, long-term management will be a serious issue if the development is not to deteriorate like some post-war estates.

Yours sincerely,

Robin Bishop  
Chair  
The Barnet Society