



Barnet Draft Local Plan
Publication Stage Representations Form

Ref: (For official use only)

PART B - Your representation

Please complete a separate Part B for each representation and return along with a single completed Part A.

Question 1: To which part of the Local Plan does your representation relate?

Representations must be made on a specific policy or part of the Plan, please state the policy number, paragraph number, figure/table or Policies Map designation.

Policy **Site Allocation No. 54** Paragraph **Page 366** Figure/Table _Plan attached for confirmation.

Policies Map designation **Site Allocation No. 54**

Question 2: Do you consider that this part of the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

- | | | |
|--|------------------------------|--|
| a) Legally compliant | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| b) Sound | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| c) Compliant with the Duty to Co-operate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound, or fails to comply with the duty to co-operate.

Please be as precise as possible. If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this box to set out your comments.

Refer to accompanying letter.

Continue on a separate sheet if necessary

Question 4: Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect to the matters you have identified in Question 3 above. Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Refer to accompanying letter.

Continue on a separate sheet if necessary

Please note:

In your representation you should summarise succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

Question 5: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing sessions?

Yes, I wish to participate in hearing session(s)

No, I do not wish to participate in hearing session(s) /
I am not seeking modification to the Plan

Question 6: If you wish to participate at the examination hearings, please outline why you consider this to be necessary.

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.

In order to clearly articulate the representations made.

Declaration of consent

The personal information you provide on this form will be processed in accordance with General Data Protection Regulations 2018 (GDPR). The information you provide will only be used for the purposes of the preparation of the Local Plan as required by the Planning and Compulsory Purchase Act 2004 (as amended), and may be used by the Council to contact you if necessary, regarding your submission. Your name, name of organisation, and comments, will be made available for public inspection when displaying and reporting the outcome of the statutory consultation stage and cannot be treated as confidential. You will not be asked for any unnecessary information and we will not publish any personal data beyond what is stated in this declaration.

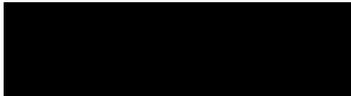
Your details will be kept in accordance with the Council's Privacy Notice, until the Local Plan is adopted plus a further five years to evidence that a fair and transparent process has been followed. Processing is kept to a minimum and data will only be processed in accordance with the law. We will take all reasonable precautions to protect your personal data from accidental or deliberate loss or unauthorised disclosure.

The Council's Privacy Notice can be viewed at <https://www.barnet.gov.uk/your-council/policies-plans-and-performance/privacy-notices>

The legal basis which enables the Council to process your data for this purpose is consent from the data subject (you) under Article 6, paragraph (a) of the GDPR. Information provided will be stored in accordance with the Council's retention and disposal guidelines.

By completing and signing this form I agree to my name, name of organisation, and representations being made available for public inspection on the internet, and that my data will be held and processed as detailed above, in accordance with the Council's Privacy Notice:

Signature



Date 6th August 2021



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3816/LBB3/NTR/MEG

By email only

6th August 2021

Head of Planning
Planning and Building Control
London Borough of Barnet
2 Bristol Avenue
Colindale
London
NW9 4EW

Dear Sir

Re: Barnet Draft Local Plan – Publication Stage Representations. Amendment to Site Allocation No. 54 – Barnet House, Totteridge

I am writing on behalf of our clients, the Baxendale Residents Association to make representations in relation to site allocation no. 54 – Barnet House. Whilst we do not object to the redevelopment of the site, we consider that this prominent site (which sits at the edge of the town centre and in close proximity to suburban residential properties) should be developed in accordance with a more detailed site allocation in the emerging development plan, in order to set the broad parameters for development and secure a high quality and contextually appropriate redevelopment. The recently published National Planning Policy Framework (2021) (the Framework) confirms that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve (paragraph 126). Good design is a key aspect of sustainable development and clarity in design expectation is essential for achieving this. The Framework confirms that plans should set out a clear design vision and expectation, with policies developed in accordance with local communities, so that they reflect local aspirations and are grounded in an understanding and evaluation of each area's defining characteristics (para 127).

Our clients support the allocation of the site as a 'Development Proposals Site' and note the indicative number of units (139) and proposed mix of uses (predominantly residential with community and office uses). However, we suggest that the development potential of this site would be better fulfilled through a more detailed site allocation which sets out the broad parameters for development to include the following;

- The maximum number of dwellings (139 as stated in both the Regulation 18 and 19 Site Allocation) to ensure that the density of development is consistent with the character of the area and is contextually appropriate;



- Indicative floorspace quanta by individual use i.e. community, employment and other commercial, with reference to the Council's most up to date employment land review and other relevant studies to ensure that sufficient employment floorspace is retained to meet identified local need;
- To secure the demolition of the tower.

A site allocation which confirms these parameters for development would set out a clear vision and expectation for the site, thereby achieving a high quality design that better reflects local aspirations and the areas defining characteristics in accordance with the revised Framework (2021).

The Context

The Barnet House site is immediately in front of the Baxendale Care Home, which sits at a lower level than Barnet House and faces the rear wall to the underground car park and the existing surface level car park. The redevelopment of this site represents an opportunity to improve this relationship through a high-quality design which has due regard to the scale, massing and character of the home and other neighbouring properties.

Paulston House is also poorly related to the existing buildings on site, being very close to the northern boundary of the site. The existing inter-relationships give rise to potential for amenity issues (overlooking/daylight/sunlight) resulting from any redevelopment. As above, the site allocation in the emerging plan should confirm the need for a high-quality development, which responds to local context in scale, form and density.

The site is immediately adjacent to and has sole vehicular access from Baxendale Road, which is a low-density, low-rise housing estate with a coherent and consistent design (three storey individual dwelling houses). The immediately adjacent site, to the south of Baxendale Road fronting the High Road, has recently been redeveloped with a mixture of apartments and town houses. These range from 2 – 7 storeys in height and have been designed to relate to the surrounding properties with descending heights to the rear of the site where they are in proximity to existing properties on Baxendale Road.

The density of any new development at Barnet House should be consistent with the prevailing density of the area. This is an outer London borough which is generally suburban in character and the development density for this site should reflect this. The indicative density should be specified in the site allocation to confirm this.

Mix of uses

The existing building is in office use (11,000 sq.m. floorspace), although it has been vacant for a short period (since March this year). The potential loss of office floorspace as a result of any redevelopment is significant and the site allocation should be used to secure a mix of uses to ensure that the appropriate quantum of replacement employment floorspace is achieved (to meet identified local market needs). The recent planning history confirms that the uncontrolled loss of office floorspace to residential use through permitted development has been particularly pronounced in Whetstone, with the result that an Article 4 Direction was issued to prevent further uncontrolled loss through permitted development conversions. However, this does not rule out loss through redevelopment requiring planning permission and the site allocation should guard against this by



requiring mixed use redevelopment in its emerging policies. Site Allocation no. 54 should clearly set out the requirement for a mixed use redevelopment and provide an indicative quantum for replacement employment floorspace.

There is an acknowledged increase in town centre housing within Whetstone and the immediately surrounding area, with a large number of residential redevelopments (recently completed, under construction and in pipeline) in close proximity. The emerging plan site allocation should include a requirement for appropriate community uses (as part of the overall mix of uses) to ensure that local infrastructure can accommodate the cumulative impacts of any redevelopment.

The Existing Tower

Barnet House is an existing 12 storey tower which sits in a very prominent position at the junction of one of the main access points to the town centre. Although it was designed by Robert Seifert & Partners, it is not considered to be of any particular architectural significance and is hugely discordant in scale, height and massing to buildings within its immediate context. The site allocation should encourage the removal of the incongruous tower to enable a contextually appropriate form of mixed use redevelopment.

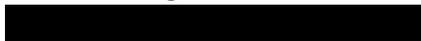
In conclusion, whilst we support the site allocation, we suggest that the wording is amended to enable a plan led, high-quality redevelopment at this prominent town centre site. The wording of the site allocation should be expanded to set the broad parameters for development (in physical form and use) and secure the removal of the existing tower.

We trust that you will give these representations due weight and look forward to continuing to promote them through the plan making process.

Yours sincerely



Meghan Allen
Associate
NTR Planning



Enc.

Site requirements and development guidelines:	<p>A portion of the site should be safeguarded for TfL / London Underground for operational purposes, to serve a future Northern Line upgrade. Station functions must be maintained. Good access to public transport and town centre functions support intensification.. Mature trees within the site should be assessed and either preserved or replaced. There is adjoining Green Belt to the west and north and Site of Borough Importance for Nature Conservation along the western site boundary, along with the Dollis Valley Green Walk. A further restricting design factor is the suburban 2-3 storey housing to the east. Building heights must be carefully considered to avoid excessive impact within the area which already has the tall buildings of Barnet House and Northway House. Homes near to the Northern Line must be provided with noise mitigation, with trains running through the night on Friday and Saturday.</p> <p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required. The detailed drainage strategy should be submitted with the planning application.</p> <p>Access to the site must be managed to form safe entrance and exit, particularly from the High Road and Totteridge Lane. Car parking requirements will be assessed and - provided within the context of a move to sustainable modes of transport.</p>
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Site No. 54	Barnet House (Whetstone Town Centre)		
Site Address:	1255 High Rd, Whetstone, N20 0EJ		
	Ward:	Totteridge	
	PTAL 2019:	4	
	PTAL 2031:	4	
	Site Size:	0.59 ha	
	Ownership:	Private	
	Site source:	Call for sites	
	Context type:	Urban	
	Existing or most recent site use/s:	Office	
	Development timeframe:	0-5 years	
	Planning designations:	Town Centre; Archaeological Priority Area	

	<p>Relevant planning applications:</p> <p>17/1313/PNO (approved) conversion to 254 residential units; 17/5373/FUL (refused) extension and 216 residential units.</p>																
	<table border="1"> <tr> <td data-bbox="853 691 1003 775">Site description:</td> <td colspan="2" data-bbox="1003 691 2051 775">A 10-storey 1960s office building and associated car parking spaces. The site is within the Whetstone Town Centre and fronts onto the Great North Road. Surrounding buildings vary from 2-6 storeys. The site is within 300m of Totteridge and Whetstone Station.</td> </tr> <tr> <td data-bbox="853 791 1133 866">Applicable Draft Local Plan policies:</td> <td colspan="2" data-bbox="1133 791 2051 866">GSS01, GSS08, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, TOW01, TOW02, CHW01, CHW02, ECY01, ECY02, ECY03, TRC01, TRC03</td> </tr> <tr> <td data-bbox="853 882 1227 935">Proposed uses/ allocation (as a proportion of floorspace):</td> <td colspan="2" data-bbox="1227 882 2051 935">90% residential uses with 10% community and commercial</td> </tr> <tr> <td data-bbox="853 951 1227 1003">Indicative residential capacity:</td> <td colspan="2" data-bbox="1227 951 2051 1003">139</td> </tr> <tr> <td data-bbox="853 1019 1133 1054">Justification:</td> <td colspan="2" data-bbox="1133 1019 2051 1054">The town centre site is accessible and could be used to provide residential uses along with ancillary town centre uses.</td> </tr> </table>		Site description:	A 10-storey 1960s office building and associated car parking spaces. The site is within the Whetstone Town Centre and fronts onto the Great North Road. Surrounding buildings vary from 2-6 storeys. The site is within 300m of Totteridge and Whetstone Station.		Applicable Draft Local Plan policies:	GSS01, GSS08, HOU01, HOU02, CDH01, CDH02, CDH03, CDH04, TOW01, TOW02, CHW01, CHW02, ECY01, ECY02, ECY03, TRC01, TRC03		Proposed uses/ allocation (as a proportion of floorspace):	90% residential uses with 10% community and commercial		Indicative residential capacity:	139		Justification:	The town centre site is accessible and could be used to provide residential uses along with ancillary town centre uses.	
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<p>Site requirements and development guidelines:</p>	<p>While prior approval (17/1313/PNO) has been granted for office to residential conversion, planning applications which come forward should include community and commercial office uses. The good public transport access and town centre location support a relatively intensive development. High quality design will be expected to reflect the context of Whetstone High Street and the prominent location of the site. The site is within an Archaeological Priority Area and must be subject to an archaeological assessment.</p>																