

Mill Hill Preservation Society founded 1949



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For the attention of Andrew Norton, Planning Officer

Major Development Team
London Borough of Barnet
2 Bristol Avenue
London NW9 4EW

12th January 2020

Your ref: 19/6551/FUL

Our Ref: JL / jl / mhps planning group

Sent only by email to: andrew.norton@barnet.gov.uk

Dear Mr Norton,

TOWN AND COUNTRY PLANNING ACT 1990:

SITE: IBSA House, The Ridgeway, London NW7 1RN

PROPOSAL: *Demolition of existing print-works/factory buildings and redevelopment of the site (to provide a total of 197 residential units) including conversion of the existing IBSA House office building into 61 flats with associated external alterations. Erection of 5 no. new blocks ranging from 3 to 6 storeys in height to provide 136 flats. Provision of private amenity space, communal rooftop terraces, refuse storage, 344 cycle parking spaces and basement and surface level parking for 197 cars. Single storey extension to the existing gate house to provide management/security office. Associated alterations to landscaping and ancillary works*

PLANNING REFERENCE: 19/6551/FUL

Background:

The development team presented the proposal to our Committee at The Studio, and subsequently held a public exhibition at Old Camdenians.

Previous applications have also been commented on, we refer to our letter 22nd August 2019 on application 19/4347/ESR in which we raised issues related to PTAL, Employment loss, Location, Characteristics of the Development, the Potential Impact and concluded the application was ill-considered that would have an adverse impact on the local environment. The comments we made in that letter are still relevant to this application and we wish them to be taken into account against 19/6551/FUL. For ease of reference the letter referred to is attached.

Assessment:

The site is an existing employment site and as such Policy DM14 of the Development Management Policies applies. It is noted that the Applicant has sought to argue that this policy isn't relevant due to Millbrook Park being approved and that employment land lost. They have not sought to provide any analysis or assessment as to the acceptability of the loss of this employment site. Whilst the background to the Mill Hill East Area Action Plan (2009) may be of some merit, it does not simply mean that the designation within that adopted document, as a 'retained employment' area can be simply ignored.

The Applicant's approach to the loss of employment land is at best dismissive and lacks any robust evidence to demonstrate that the loss of this mixed use site is acceptable and is not required for any alternative employment use. It is assumed that the site has not been marketed for any alternative use, or continued mixed use, therefore the Applicant has no evidence to show it is not required for its continued use or an alternative employment use.

Whilst the findings associated with Millbrook Park may be similar for this site, they did submit a robust Employment Study and therefore addressed Policy DM14. The Applicant should be made to adhere to planning policy and similarly demonstrate that this site is not required.

Whilst the site is not located within the Green Belt, it is adjacent to it, accordingly, the site is sensitive and as such any proposed development needs to be reflective of this edge of settlement, more rural location. We would therefore expect a development to be lesser density, and of the highest design standards appropriate to the sensitive location and in accordance with the National Planning Policy Framework. We find this is not the case.

We would like to refer to the design principles for the Millbrook Park development that is adjacent to the site. The heights of the various phases were managed carefully, with 2 and 3 storey houses near the Green Belt edge, increasing in size across, and down, the site towards the underground station where 6 and 7 storey blocks are located. This philosophy has been adhered to and respects the nature of both the Green Belt and Partingdale Lane.

Appreciating that this site does not need to comply with the design principles established as part of an adjacent development, the Applicant cannot seek to rely on the employment land argument applied to the Millbrook Park development and then ignore other parameters.

The proposal fundamentally undermines the established design approach to the area. The retention of IBSA House will automatically lead to residential properties at a higher level than the surrounding development, but this does not set a precedent for an additional 5 blocks of development between 3-6 storey's, complete with upper floor terraces. The retention and conversion of IBSA House provides a 'nod' to the historic use of the site.

The surrounding residential development is comprised of 2-3 storey dwellings, with some flat blocks, but not exceeding 3 storeys. Most surrounding development is also at a lower level than the IBSA site - when reviewing the site sections submitted with the application this is not proposed to be altered. This is particularly significant when reviewing sections D-D and 4-4.

Consequently, any ground floor of the proposed site will automatically be at a higher level than the adjacent residential units.

To the north, the development will tower above the established tree belt dominating the rural edge, undermining the openness of the Green Belt, while development to the south, adjacent to Albuhera Mews, will be significantly closer to the boundary and almost 2 storeys higher (when including the roof plant) than the existing eaves of the factory building.

Accordingly, the physical scale of this development will be overbearing on adjacent properties, and unduly dominate from numerous vantage points, most significantly the wider Green Belt. The appearance of such large dominant blocks will result in an alien feature within the landscape undermining the concept which underlies the whole development of the adjacent Barracks site, with which the proposal will be read.

We are especially concerned about Block A: this is the one parallel to Partingdale Lane being of six storeys plus roof constructions and is immediately adjacent the main Front Site building where it steps down in height to one or two storeys as the land drops away. Block A is totally disproportionate to the adjacent blocks on the frontage and to the immediate surroundings.

The height of the blocks is a significant issue. They will be an unwelcome intrusion into an otherwise rural scene and will be visible over a wide area from almost all directions. Users of the Green Belt and its footpaths need to be considered. As such the proposals will run against current thinking that such rural views are beneficial to health and therefore to be safeguarded; of added importance in this location is that 'the valley' is illustrated in several of the wider London Plans as an area to be included in 'Living Landscape' and 'Green Grid' proposals, the object of which is to keep such areas for people to walk in and mentally escape the 'built environment'. The proposal would be contrary to the Health and Wellbeing agenda set out in the National Planning Policy Framework.

The design of the blocks are also considered to be somewhat random, providing a vague nod to the host building, their boxy form bears no relationship to the red brick 'L' shaped host building, or the adjacent new development which successfully combines a dominance of more traditional built form, with hints of contemporary design, again with a focus on red brick and render.

The height and massing of the buildings, as highlighted above will dominate the public vantage points of the site and rural area beyond, but this will only be further exacerbated by the alien form of design proposed that will create a significant discord between what is appearing to be a successful adjacent development and a visual eyesore.

Concerns regarding the visual impact of the development are further exacerbated when regard is given to the impact on adjacent trees. Whilst the Arboricultural Report alludes to no impact on trees, it does raise some concerns.

The report fails to consider the increase in below ground excavation towards the northern boundary, with the introduction of a ramp and additional parking adjacent to this boundary.

These works will require significant retaining walls and detailing, such that regard needs to be given to the impact on the root structures of adjacent trees. The loss of any trees adjacent to this boundary will further open up the views of the site from the wider Green Belt.

To the south the Arboricultural Report highlights an area of land whereby hard-surfacing needs to be removed by hand to allow for level changes and tree roots, however, this position is then undermined when development is required to occur within the tree protection zone. Appreciating that the Applicant has indicated a piling method for foundations, there is no indication as to how an invasive machinery-hungry method required for blocks of this size can be reconciled against the need to hand remove hard surfacing to protect the trees?

Lastly, there has been no regard given to the future impact on trees. The CGI's submitted with the application show clearly that the separation distances between trees and blocks are limited, such that the pressure to remove trees in the future due to the impact on sunlight and daylight, along with nuisance leaf fall will be high.

We also object to the description by the Applicant of the tree strip alongside Partingdale Lane as 'woodland' as it is no more than deciduous scrub in a lot of places that does not screen the existing low rise buildings effectively, and which will certainly not screen such a large development. Being deciduous it has no screening impact in winter.

We turn to neighbour amenity, large tower blocks looming over existing residential properties, complete with balconies large enough to sit out and enjoy, will result in direct overlooking into habitable room windows around the site. The worst relationship will be along the southern boundary and the relationship with properties on Albuhera Mews. The plans show a separation distance of circa 23.5m, this may be a suitable relationship for a back to back dwelling situation, where there is no terracing at first floor or above, in this instance there are three storey balconies. Even if it could be argued that there is no direct loss of amenity as a result of this relationship, there is a perceived loss of amenity and privacy, as the central balconies on Block D particularly have direct views into bedroom windows.

Conclusion:

It is our opinion that this application is unacceptable on a number of grounds, but most critically, the Applicant has failed to address the matter of the principle of a change of use of the site in the first instance by failing completely to address Policy DM14. It is not acceptable for a developer to 'cherry pick' policies considered to apply to them to best suit their case.

Further to this we are of the opinion that the proposal will result in an incongruous development on a sensitive site adjacent to the Green Belt, and will result in a loss of trees that will exacerbate the impact of views into the site and lead to a loss of residential amenity.

It is not considered that there are amendments to this application that can be made to make it acceptable. The application should be refused or withdrawn and the Applicant required to address the matter of Employment Land before any alternative scheme is progressed.

Yours sincerely

John Living

John Living - Honorary Architect
On behalf of MHPS Planning Group

Copied by email to:
Emma Watson LBB
GLA Representative
NW7 Councillors
MHPS planning group