

PROOF OF EVIDENCE

APP/N5090/V/22/3307073

HERITAGE AND DESIGN

B and Q, Broadway Retail Park, Cricklewood Lane, London, NW2 1ES 20/3564/OUT

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1. Introduction

1.1: I have been employed by the London Borough of Barnet as a Planning Officer in the Urban Design and Heritage team for approximately 14 years. The role entails commenting on proposed works to listed buildings and developments within or impacting on conservation areas. We also create Conservation Area Character Appraisals, analysing what is significant about Barnet's conservation areas and how the council might best be able to preserve or enhance them.

1.2: Prior to this role, I was Assistant Conservation Officer at Epping Forest District Council. I have a Degree in Historic Building Conservation and am a member of the Institute of Historic Building Conservation.

1.3: Declaration of Truth

I declare that the evidence set out in this proof for the appeal is true to the best of my knowledge. The opinions expressed are my own and are formed from professional judgement based on my knowledge.

2. Context and site analysis

2.1: There are two designated heritage assets which are in close proximity to the site, and which are situated within Barnet.

The Cricklewood Railway Terraces Conservation Area:

2.2: The Railway Terraces, Cricklewood Conservation Area was designated by the Council in March 1998. Government legislation on conservation areas and historic buildings generally, is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990, which states in section 71: "It shall be the duty of a local planning authority from time to time to formulate and publish proposals for the preservation and enhancement of any parts of their area which are conservation areas." This means that the Council's efforts in the area are geared to preserving and enhancing its special character and appearance. The majority of historic buildings are also locally listed, so are non-designated heritage assets which need consideration. The formal, regular streetscape and building layout, together with the unusual relationship between buildings, private and public open space all help to give the area a distinctive, intimate but ordered feel. The area is characterised by small scale, dense development with regular building rhythms and designs.

The Crown Public House:

2.3: This is a Grade II listed building, listed in 1981, situated on Cricklewood Broadway. The list description is as follows:

The Crown Public House TQ 28 NW 7/11 20.11.81

II

"Dated 1900. Grand "Jacobean" public house of 2 storeys with 2 dormered storeys in mansard roof. Three storey wing to right 4 bays faced in sandstone. Rusticated attached columns and pilasters flank 4 entrance doors to main block and 2 doors to wing, first floor projection of 16 lights with single flanking 2 light windows. Two windows to wing. Two bay decorative gabling at second floor with mullioned windows surmounted by blind archway. Second floor to wing battlemented with ornamental crest, pyramid roof and decorative finial."

Historical Development of the conservation area and surroundings (excerpt from the CA Character Appraisal)

2.4: In 1866 Midland Railways built the Bedford to St Pancras line with the then named "Childs Hill and Cricklewood Station" opening for passengers in 1870. The arrival of the railway heralded an era of intense expansion for Cricklewood with both housing and factories being built. In 1892 George Furness opened the first factory in the area, the Imperial Dry Plate Company works which dealt with photographic material. The legacy of the railway and the development it facilitated can clearly be seen in Cricklewood today. There are many industrial sites and early suburban housing estates all bounded and crossed by major transport routes.

2.5: The terraces are located within a wider area dominated by the railways and large industrial/commercial units. Prominent neighbouring users include a telephone exchange, bingo hall, a large DIY store, and a Travelodge. The area is located to the north of the central part of Cricklewood Town Centre, with its numerous individual and independently owned shops along Cricklewood Broadway. To the south and west, in the London Borough of Brent, there are Victorian and Edwardian residential roads built after the advent of the railway

2.6: When the Midland Railway built the St Pancras to Bedford line in the 1860s, it purchased 150 acres of former agricultural land in Cricklewood. Part of this land was used to build an extensive depot and marshalling yard to service the London end of the line. The depot sat by the junction of the main line and the Cricklewood Curve, a line which ran from Cricklewood to Acton where, by 1884, it connected with the Great Western and London and Southwestern lines. Work started on the depot with the building of a large engine shed in 1882 followed by sidings and dispatching sites for coal and other goods.

2.7: Directly south of what was the depot, construction of the Railway Terraces as housing for rail workers commenced in the late 1860s. There are five terraces in all; Gratton Terrace, facing Cricklewood Broadway, and Midland, Johnston, Needham and Champion Terraces behind. An institute for the education of workers was built at the end of Gratton Terrace but has since been demolished and replaced by Dorchester Court. There is also a former railway hostel at the end of Gratton Terrace which was built after 1894 and is now the Sindhi Centre.

2.8: It would appear that Gratton, Midland and Needham Terraces were the first to be built, with Johnston Terrace being added between Midland and Needham Terraces by the 1890s and Champion Terrace being built at a later date. A row of six shops with flats above, known as Burlington Parade, was built fronting Cricklewood Broadway and backing onto Gratton Terrace in 1908.

2.9: Originally Gratton Terrace was divided into four blocks of ten houses and the access roads which divide the back terraces, passed between these blocks to reach the grass bank running along Cricklewood Broadway. At some point between 1915 and 1936 however, houses were built as infill development on two of these access roads linking three of the earlier blocks to create a continuous block of 34 houses on Gratton Terrace.

2.10: Two main sizes and styles of house were originally constructed within the conservation area. Gratton Terrace consists entirely of larger houses, built for higher grade railway workers. These houses face onto Cricklewood Broadway, are built on a grander scale with more ornate architectural detailing and feature large rear gardens.

2.11: The terraces to the rear of Gratton Terrace are smaller more humble dwellings, featuring a minimum of architectural detailing and small back yards facing onto narrow service roads. There is currently an open green swathe between Midland and Johnston Terrace and individual garden plots between Needham and Champion Terraces. In 1894 the green swathe was in existence, but Champion Terrace was not built and the houses in Needham Terrace did not appear to have front gardens. At some time before 1962 the green swathe between Midland and Johnston Terrace was divided into individual garden plots, possibly during the Second World War as part of the war effort to grow food.

2.12: In 1969 the Terraces were sold to Bradford Property Trust by Grattons and residents voted on whether to keep the individual garden spaces. As a result, the area between Midland and Johnston Terraces was re-established as open grass whilst the other gardens were retained. At this time trees were planted, and brick walls and railings were put up at the end of the grass swathes to create semiprivate amenity space.

Summary of significant characteristics and values

2.13: Evidential value: the terraces (photo below) are a unique record within Barnet of an earlier Victorian socio-economic philanthropy, whereby industries provided more than simple monetary compensation to their workers and attempted to give them a better quality of life in return for their labours albeit retaining a sense of the social hierarchy in the size and positioning of the dwellings.



2.14: Historical value: This is demonstrated in the relationship of the creation of the terraces alongside the historic development of the railways, and their impact on the social and economic fabric of British society, providing an illustration as to how working-class people lived in the past. Some of the small cottage properties retain the original rear coal shed and outhouse

(photo below), and the rooflines retain their prominent chimneys, evidence of a time when coal fires were commonplace within the city.



2.15: Aesthetic value: due to its isolation from the main road, there is very little vehicle movement passing through the conservation area, helping to ensure that the atmosphere of the area is that of a quiet oasis with no real sense of the impingement of the outside metropolis. The linear roads and original tight-planned layout of the development has meant that there have been few opportunities for new development to take place. Many of the original gardens, both communal (photo pg. 8) and private have survived, creating a sense of openness within the conservation area. The allotments have been retained and are still very much in use today, providing a valuable green space and a community hub for the residents, with a long waiting

list for new members. Where original architectural features and detailing have been retained, they help to maintain the historic character and charm of the houses.



2.16: Communal value: Many of the original gardens, both communal and private have survived, creating a sense of openness within the conservation area. The allotments (photo pg. 9) have been retained and are still very much in use today, providing a valuable green space and a community hub for the residents, with a long waiting list for new members. The Terraces Residential Association helps to maintain and foster a strong sense of community within the terraces and many generations of families choose to or wish to stay within the conservation area.



3. Policy Context

Relevant policies and supplementary guidance

- The NPPF 2021
- The NPPG 2021
- The London Plan 2021
- Barnet's Local Plan 2012
- Railway Terraces Cricklewood Conservation Area Character Appraisal and Management Proposals 2016
- National Design Guide 2021
- Historic Environment Good Practice Advice in Planning Note 3 (Second Edition): The Setting of Heritage Assets 2015 (HEGPA)
- Conservation Principles, Policies and Guidance 2008

Heritage

3.1: NPPF 197 states that in determining applications, local planning authorities should take account of.....c) the desirability of new development making a positive contribution to local character and distinctiveness.

3.2: NPPF 199 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation..... This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

3.3: NPPF 200 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

3.4: NPPF 202 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

3.5: NPPF 203 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset

3.6: Local Plan Policy DM01 provides as follows: **Protecting Barnet's Character and Amenity: development proposals should preserve or enhance local character and respect the appearance, scale, mass, height and pattern of surrounding buildings, spaces and streets.** In order to protect character Policy DM01: **Protecting Barnet's Character and Amenity requires development to demonstrate a good understanding of the local characteristics of an area. Proposals which are out of keeping with the character of an area will be refused.**

3.7: Local Plan Core Strategy Policy CS5 provides as follows: Protecting and Enhancing Barnet's Character to Create High Quality Places highlights **that development in Barnet should respect the local context and distinctive local character.**

3.8: The London Plan makes it clear within Policy HC1 that **“Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings.** The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.”

3.9: The London Plan goes on to state in paragraph 7.1.7 that **“Development that affects heritage assets and their settings should respond positively to the assets’ significance, local context and character to protect the contribution that settings make to the assets’ significance. In particular, consideration will need to be given to mitigating impacts from development that is not sympathetic in terms of scale, materials, details and form.”**

3.10: HEGPA 3 paragraph 8 states: **Consideration of setting in urban areas, given the potential numbers and proximity of heritage assets, often overlaps with considerations both of townscape/urban design and of the character and appearance of conservation areas.** Conflict between impacts on setting and other aspects of a proposal can be avoided or mitigated by working collaboratively and openly with interested parties at an early stage.

3.11: HEGPA 3 paragraph 9: Cumulative change Where the significance of a heritage asset has been **compromised in the past by unsympathetic development affecting its setting,** to accord with NPPF policies consideration still needs to be given to **whether additional change will further detract from,** or can enhance, the significance of the asset.

3.12: HEGPA 3 paragraph 36 states: Cumulative assessment is required under the EU Directive on EIA. Its purpose is to identify **impacts that are the result of introducing the development into the view in combination with other existing and proposed developments.** The combined impact may not simply be the sum of the impacts of individual developments; it may be more, or less.

3.13 HEGPA 3 paragraph 39 states: Options for reducing the harm arising from development may include the repositioning of a development or its elements, changes to its design, the creation of effective long-term visual or acoustic screening, or management measures secured by planning conditions or legal agreements. **For some developments affecting setting, the design of a development may not be capable of sufficient adjustment to avoid or significantly reduce the harm, for example where impacts are caused by fundamental issues such as the proximity, location, scale, prominence or noisiness of a development.**

Design:

3.14: NPPF 130: Planning policies and decisions should ensure that developments:

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- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
 - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

3.15: NPPF 134: Development that is not well designed should be refused.....Conversely significant weight should be given to: b) outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, **so long as they fit in with the overall form and layout of their surroundings.**

3.16: The London Plan states: 3.1.7 As change is a fundamental characteristic of London, respecting character and accommodating change should not be seen as mutually exclusive. Understanding of the character of a place should not seek to preserve things in a static way but **should ensure an appropriate balance is struck between existing fabric and any proposed change.** Opportunities for change and transformation, through new building forms and typologies, should be informed by an understanding of a place's distinctive character, recognising that not all elements of a place are special and valued.

3.17: London Plan Policy D3 states: Development proposals should: Form and layout 1) enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, **with due regard** to existing and emerging street hierarchy, building types, forms and proportion.

3.18: Local Plan Policy DM01: Protecting Barnet's character and amenity states:
b. Development proposals should be based on an understanding of local characteristics. Proposals should preserve or enhance local character and **respect the appearance, scale, mass, height and pattern of surrounding buildings**, spaces and streets.

3.19: Local plan section 6: Tall buildings states:

6.1.2 Tall buildings can make a positive contribution to a place, but **they can also harm the qualities that people value.** Due to their potential impact applicants with tall buildings proposals will need to provide evidence of how they have considered the criteria in the policy as well as the CABI/ English Heritage guidance on tall buildings.

6.1.3 London Plan para 7.25 defines a tall building as one that is substantially taller than its surroundings, **or significantly changes the skyline**. Barnet's Core Strategy defines a tall building as being eight storeys (equivalent to 26 metres above ground level) or more and identifies locations where proposals may be appropriate. (It should be noted that the EBLP has put a cap on the number of storeys to define a tall building and anything over 15 storeys is considered a Very Tall Building - VTB)

6.1.4 Key issues include the impact of tall buildings on the immediate street and how the design integrates with the wider urban fabric. **The council will consider whether the design has a harmonious relationship with the rest of the street**, the continuity of frontages and street level entrances.

3.20: Local Plan Policy DM05: Tall Buildings states:

Tall buildings outside the strategic locations identified in the Core Strategy will not be considered acceptable. Proposals for tall buildings will need to demonstrate:

- i. an active street frontage where appropriate
- ii. **successful integration into the existing urban fabric**
- iii. **a regard to topography and no adverse impact on Local Viewing Corridors, local views and the skyline**
- iv. **not cause harm to heritage assets and their setting**
- v. that the potential microclimatic effect does not adversely affect existing levels of comfort in the public realm

3.21: Local Plan Core Strategy DPD states:

10.6.2 The predominant character of Barnet is two or at most three storeys. As Barnet changes over the next fifteen years, it is expected that there will be pressure for tall buildings (defined in Barnet as being eight storeys (equivalent to 26 metres above ground level or more) to play a part in new development. While tall buildings offer the opportunity for intensive use, **their siting and design should be carefully considered in order to not detract from the nature of surrounding places and the quality of life for those living and working around them.**

10.6.5 We will seek to ensure that development is compatible with such views in terms of setting, scale and massing and **will resist proposals that we consider would cause harm to them. Development will not be acceptable if it obstructs important local views or skylines.**

3.22: The National Design Guide states in Part 2: The ten characteristics:

Context:

Well-designed places are:

- based on a sound understanding of the features of the site and the surrounding context, using baseline studies as a starting point for design;
- integrated into their surroundings so they relate well to them;
- influenced by and influence their context positively; and
- responsive to local history, culture and heritage.

Identity:

This includes considering:

- the composition of street scenes, individual buildings and their elements;
- the **height, scale, massing and relationships** between buildings;
- **views, vistas and landmarks**;

Built Form:

Proposals for tall buildings (and other buildings with a significantly larger scale or bulk than their surroundings) require special consideration. This includes their location and siting; **relationship to context; impact on local character, views and sight lines**; composition - how they meet the ground and the sky; and environmental impacts, such as sunlight, daylight, overshadowing and wind. These need to be resolved satisfactorily in relation to the context and local character.

3.23: The London Plan Policy D9: Tall Buildings states:

d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area

Assessment of Proposals

General comments:

4.1: Whilst there is no in-principle objection to the redevelopment of this site, it is clearly demonstrated within the applicant's own submissions, such as in the visual section of assessment of likely effects, found in the HTVIA parts 2 and 3, that in terms of the overall scale, density, massing, height, layout, and relationship to neighbouring buildings and the local area more generally, the proposal does not promote or reinforce local distinctiveness. The proposals do not provide for good connections between people and places, the character of the surrounding vernacular and building typology in the local area and the integration of this large scale development into the existing built and historic environment, where, as stated in the Residents Association So C, "the streets to the south are largely streets of two-storey terraces and the older Railway Terraces to the north-west are laid out as terraced blocks, largely cottages, separated by short streets but off the main road with no through roads."

4.2: It is interesting to note, looking through the applicant's Built Heritage, Townscape and Visual Impact Assessment (HTVIA), that the proposed development is merely outlined with a blue line, rather than fully rendered. Whilst the application is in outline, and materiality is therefore not known, this approach, necessarily, provides a more limited impression of the impact in real life and this should be borne in mind when utilizing wireframes. It is clearly evident, however, even limited to wireframes, in long distance views such as views 1,3 and 4, found in HTVIA part 2 for example, the sheer scale, height and mass of the proposed development is visually intrusive. But view 5 best demonstrates the vast disparity and inappropriateness of scale, height and massing between the existing built environment of the locality and the proposal. In all of these representations, however, the viewer needs to make mental adjustments to allow for the appearance of actual buildings rather than mere silhouettes,

The Cricklewood Railway Terraces Conservation Area:

4.3: Views into and out of the conservation area are important. [HEGPA3](#) states that "The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset." It further indicates that views may be identified in character area appraisals or in management plans as is the case in the Railway Terraces Townscape Appraisal map where views are indicated. It is interesting to note that the original character appraisal for the area recognises that harm has been caused with "*views from the Conservation Area to intrusive features such as the mast to the northeast across the railway line and the new industrial building on Kara Way and glimpsed views of the ends of Gratton Road from Edgware Road.*"

4.4: The fact that these developments are considered intrusive pales into insignificance in relation to the scale of intrusiveness that the proposed development will have on views, particularly looking south and east. It should be pointed out that the various views submitted by the applicant from within the conservation area are taken at ground level and fail to recognise the views that resident will have of the development from within their properties at first floor level. However, nowhere is the vast disparity in scale, height, mass and bulk and its

impact demonstrated more clearly than between the locally listed buildings within the conservation area and the proposed scheme demonstrated more clearly than in view 14, taken from the allotments to the east.

4.5: This view demonstrates the concern, consistently expressed by the Council's Design Team, about the need for the blocks nearer the CA need to be more respectful in size and scale to the existing terraces. Whilst the blocks do diminish in storey height the closer they come to the terraces, far greater reduction in storey height would need to happen in order for an appropriately respectful relationship to be achieved. Careful examination of View 14 on site makes this apparent; the existing Jewson's building is not visible in the summer View 14, but is visible in the winter, so can be used as a marker, together with the prominent coniferous tree. The degree of intrusion that the large scale tower blocks would have on the small, tranquil domestic scale of the terraces and their associated allotments would be significant and detrimental to the surprisingly peaceful, historic and small scale character and appearance of the Conservation Area. The blocks would bring the presence of the metropolis into the surroundings in which this remarkable heritage asset is experienced. Given that all the blocks are prominent in most views looking south this would need to be applied to all the tower blocks.

4.6: The most recent appraisal states that "*Chimneys are part of the historic streetscape, and an important visual feature because of their prominence as seen against the shallow pitch roofs, making a positive contribution to the conservation area. They usually have tall terracotta clay pots which are striking features against the skyline.*" These features are identified as positive characteristics within the conservation area. It is quite obvious that in views looking south towards the scheme, these positive features will disappear into the mass of the new development behind, which would adversely affect their significance in their contribution to the CA, as seen in views 13-16 inside the CA in the HTVIA part 3.

4.7: Conversely, the appraisal talks about inappropriate development. Certain development which borders the conservation area, such as the Cricklewood Timber warehouse on Kara Way and the Access Storage building and railway infrastructure to the north, including proposed development on land at Cricklewood Railway Yard and a large sound-bank development has failed to respect the character of the original buildings within the conservation area and careful consideration would need to be given to the scale, siting and design of any new development and a high standard of design and materials will be expected.

4.8: As such I consider that the proposed development, in terms of its excessive scale, mass, bulk and height will have a detrimental impact and cause less than substantial harm to the setting of the designated heritage asset.

The Crown Public House:

4.9: The Statutory Listed building is set back from the pavement with a large forecourt to its front. It is connected, by a rear extension, to the neighbouring Clayton Crown Hotel, which sits forward of the pub in the street. Due to the difference in architectural appearance of both buildings, the pub appears in the streetscene as a standalone structure. It is a prominent building within the townscape, viewed and experienced as it is with its iconic roofscape and a clear open sky above and around it.

4.10: The applicant's HTVIA part 2 clearly shows in view 08 that due to the height of the proposed main tower, this block would be clearly visible in views from the public realm looking north. Another smaller block would then be seen to "fill in" the existing space between the pub and its neighbour to the north.

4.11: Whilst no direct harm would be done to the heritage asset itself, I consider that its setting would be harmed and therefore that its significance within the streetscape and Cricklewood town Centre would be diminished by the visual intrusiveness of the proposal. The harm would be less than substantial under the NPPF.

Wider surrounding environment:

4.12: Cricklewood is generally characterised by a significant number of residential streets of two storey largely late Victorian and Edwardian terraced housing. Parades run along the main high street with commercial units at ground floor level, with traditional parades usually ranging between one and three storeys above. More recent developments such as the Travelodge, with a Tesco unit at ground floor do go up to an additional four storeys in height. Approvals for other developments with a greater number of storey heights above on the main high street may have also been approved recently, but these do not appear to have been built out, as of yet. But slightly larger and taller developments can be found running along these main roads with traditional residential terraced low density level housing behind them.

4.13: One of the traditional housing typologies in Barnet is detached, suburban terraced, urban terraced, residential housing. Barnet's urban terraces include some of the borough's most dense residential housing; they were predominantly built during the Victorian and Edwardian periods. Terraced streets have a strong coherent appearance due to the consistent and rhythmic architectural style and consistent street profile, usually with on-street parking.

4.14: Flatted development, detached, and linear-rural detached are the least common housing types in Barnet. Within the Local Plan Core Strategy document, the London Borough of Barnet defines tall buildings as being eight storeys (equivalent to 26 metres above ground level or more). High rise housing is not common to the Cricklewood area, with the exception of the 8-storey residential block of flats at Angle/Coleby House along Cricklewood Lane, with commercial units at ground floor and the purely residential nine storey Ashford Court, a block of flats in the neighbouring council of Brent. It is clear from the applicant's submitted HTVIA views that aside from the uncharacteristic relationship the development has with its immediate built environment, the significant height, size and scale of the development, being so much greater than that surrounding it, is highly visible in longer range views and is highly alien within its context. Views such as nos. 6, 7, 9 and 11 in HTVIA part 2 clearly demonstrate this disparity.

4. **Conclusion:**

5.1: Contrary to NPPF paragraph 134, the development proposals do not “fit in with the overall form and layout of their surroundings.” The development has not attempted to “ensure an appropriate balance is struck between existing fabric and any proposed change” as stated in paragraph 3.1.7 of the London Plan.

5.2: Under London Plan Policy D3, the development does not “enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportion” nor under Local Plan Policy DM01 do the proposals “preserve or enhance local character and respect the appearance, scale, mass, height and pattern of surrounding buildings, spaces and streets.”

5.3: It is therefore quite clear that the Council’s putative Reason for Refusal remains valid: The proposed development and the parameters sought, by virtue of the excessive height, scale and massing would result in a discordant and visually obtrusive form of development that would demonstrably fail to respect the local context and its established pattern of development, to the detriment of the character and appearance of the area and the setting of the adjacent Railway Terraces Conservation Area. The proposal would therefore not create a high-quality development, not constitute a sustainable form of development and would be contrary to the provisions of the NPPF, Policies D3, D4, D9 and HC1 of the London Plan 2021 and Policies CS5, DM01, DM05 and DM06 of the Barnet Local Plan Core Strategy and Development Management Policies 2012.

5.4: In view of the above, the Inspector is respectfully asked to dismiss the appeal and refuse planning permission.