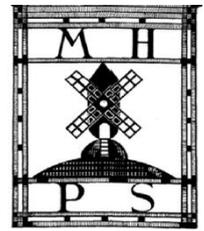


# Mill Hill Preservation Society founded 1949

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*...making change worthwhile*

## **Hardeep Ryatt, Planning Officer**

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

26<sup>th</sup> February 2021

Your reference: 21/0332/FUL

Our Reference MHPS / JL / planning group / 21/0332/FUL

Sent only by email to Hardeep Ryatt ( [Hardeep.Ryatt@Barnet.gov.uk](mailto:Hardeep.Ryatt@Barnet.gov.uk) )

Dear Hardeep Ryatt,

### **TOWN AND COUNTRY PLANNING ACT 1990**

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

**PROPOSAL:** Single storey front foyer extension of 49sqm and side extension of 147sqm to IBSA House building and sole use as Class E (g) (i) Office Space; Separate independent use of the former Printworks and existing factory buildings as Class E (g) (iii) Light Industrial or Class B8 Storage or distribution space; Relocation of the single storey Gate House building; re-use of existing car parking and servicing areas to provide 80 surface level car parking spaces and 112 cycle spaces.

**REFERENCE:** 21/0332/FUL

## **1.0 Background**

1.1 We note that the previous application ref 19/6551/FUL for a residential development of nearly two hundred units (197) is still with the Council undecided. The planning group of the Society have studied this new application in relation to minor alterations to the International Bible Students Association (IBSA) House including the offices, former printworks and parking. The proposal looks to bring the overall site back into meaningful employment use.

1.2 IBSA House has various planning uses and this application would bring the building to part Use Class E(g)(i) (Office Space) and Class B8 (Storage and Distribution). The two elements would be formed by blocking off the physical links between the various parts of the building such that they become self-contained entities.

1.3 The relocation of the Gate House building, the extension of the entrance foyer and the proposed small extension on the south side do not seem unreasonable and would not significantly increase the bulk of the building.

## 2.0 Employment on the Site

2.1 The site has a history of employment in the locality where Carl Zeiss optical works was built in 1912 later becoming the United Kingdom Optical Company after wartime until 1988 when the IBSA took over the site. This association was part of Jehovah's Witnesses who occupied Watchtower House on the other side of The Ridgeway.

2.2 When the brief for the adjacent Millbrook Park project was proposed the site was considered as an employment centre for the development providing about 500 jobs. The Planning Statement accompanying the application makes reference to this in Clauses 4.37 to 4.39.

2.3 Clause 2.14 of the Planning Statement states - *This application is still ongoing and is yet to be determined. It is also unrelated to this new application as it relates to a proposed residential use of the site – this proposal to continue the existing office / industrial uses of the site is being considered as an alternative scheme in order to bring the site back into productive use with the residential proposal still under consideration.*

2.4 The Society holds the view that so many employment opportunities have been lost locally that it is encouraged by this application to maintain the employment use on the site.

2.5 However, we are confused that the Planning Statement at Clause 4.11 references the London Plan (2016), Policy 4.4 ... *'Managing Industrial Land and Premises' states that at a strategic level, boroughs should manage the release of surplus industrial land and premises (providing a sufficient stock is maintained) so that surplus land "can contribute to the strategic and local planning objectives, especially those to provide more housing.*

2.6 Clearly the submission was made in advance of the adoption of the Publication London Plan 2020 which now usurps the London Plan 2016. It would appear that the Planning Statement only references policies within the then Draft London Plan that relate to residential re-development.

2.7 The quoted clause seems erroneous in a planning application for employment uses. Is there an underlying strategy here that an application for residential use will be forthcoming once the current application for employment use is granted? The Society will be concerned by this.

## 3.0 Building Uses

3.1 The Applicant states that during the course of discussions with the London Borough of Barnet (LBB), the Council have advised their view is that the site comprises a single 'mixed', sui generis planning use. The applicant's view to the contrary remains that the main part of the front building comprises an independent office building, with the rear comprising separate industrial/distribution space – entirely separate uses with independent accesses that just happened to have been utilised by the same operator.

3.2 Notwithstanding the Applicants view on this matter, this new application proposes to formalise the separate use/occupation of the front and rear parts of the site as part of an application for associated alterations to the buildings on site to facilitate this.

3.3 Clause 3.4 of the Planning Statement states: *The changes proposed to facilitate the subdivision of the site into two separate planning units are as follows:*

- *The existing doorways and connections between the front (office) and rear (warehouse) buildings are to be blocked off.*
- *It is proposed to replace the entrance foyer to the front of the office building with a slightly larger foyer that extends approximately 4m from the building's front elevation. The extension will feature a flat roof to match the outline and materials of the main roof, as well as windows, doors and brickwork to match the existing.*
- *A small infill extension is proposed to the side of the west (front) office building. The extension will adjoin the office buildings southern edge and provide additional office accommodation at ground floor level. Like the foyer extension, this will feature brickwork, glazing and a flat roof to match the existing building.*
- *The gatehouse on the northern side of the sites entrance is to be relocated to the southern side of the entrance. This will match the design of the existing gatehouse.*
- *It is proposed to formalise the parking arrangement so that both the front (office) building and rear (warehouse) building have access to their own separate parking facilities.*

3.4 We note the application has been submitted referencing the following use classes:

*"Minor external alterations and use of site as separate Class E (g) (i) office space in front building and flexible Class E (g) (iii) Light Industrial or Class B8 storage and distribution space in rear buildings"*

3.5 The proposal is to facilitate an independent office building and an independent light industrial building. This application is aimed at formalising the separate uses of the two parts of the site as part of other minor proposals to alter the exterior of the buildings to enable them to be fit for occupation by separate new tenants/occupiers who are currently in discussions with the Applicant over the site.

## **4.0 Car Parking**

4.1 The site is located where the Ptal level 1b changes to level 2.

4.2 Clause 5.15 of the Planning Statement notes the proposals include 40 car parking spaces associated with the office accommodation, and 40 spaces associated with the rear light industrial/distribution area. On the basis of a total of 80 spaces, the provision falls comfortably within the maximum standards set out in the London Plan guidance.

4.3 Of the spaces, 5% in total are provided as disabled bays and a further 5% as required for future disabled parking provision, in-line with the new London Plan standards. 20% of all the spaces are also to be provided with electric vehicle charging points and all other spaces provided with passive provision, in line with new London Plan standards.

4.4 Clause 5.16 of the Planning Statement states that with regards to cycle storage, a total of 100 cycle spaces are to be provided within three covered external and secure stores, and a

further 12 cycle parking spaces for larger bicycles are provided in the form of Sheffield Stands. This meets London Plan requirements and should therefore be considered an acceptable provision.

4.5 The updated parking layout can be seen in full on the submitted Site Plan Clause 4.14 of the Planning Statement discusses car and cycle parking standards in relation to Policy 6.9 'Cycling' and Policy 6.13 'Parking' of the London Plan (2016) [See our previous note on the Publication London Plan 2020 on page 2].

4.6 These standards relate to residential proposals and we are surprised that they are referenced in this application. Table 6.3 of the London Plan, designed for residential development, is even quoted. Clause 4.24 also discusses parking in relation to residential development. All this is of concern as this is an employment application.

4.7 Given the publication of the new London Plan and the clear errors in this submission, the Applicant should be asked to produce an addendum to the planning statement that accurately reflects the correct up to date policy and the application itself.

## **5.0 Design & Noise**

5.1 In terms of commenting on the proposal, we note there is no noise assessment supporting the application. The buildings are in close proximity to residential units and a generic light industrial/storage and distribution use has the potential to cause disruption, particularly if activities and outside storage result. The application should be supported by a noise assessment, this would then inform a condition pertaining to acceptable boundary noise levels that can be monitored if required.

5.2 Additionally, given the proximity of these buildings to residential uses, we would ask that hours of operation are also restricted to ensure residential amenity is preserved.

## **6.0 Environment**

6.1 Clause 2.10 of the Planning Statement notes that the site is located within flood zone 1 and has low probability of flooding from river or sea.

6.2 The unmanaged woodland area to the north of the existing buildings comprises an area of TPO trees with a group listing. Furthermore, this woodland area, Partingdale Lane and the land north of Partingdale Lane are all designated as Green Belt.

We note that no built development will encroach into the Green Belt as a result of the proposals.

## **7.0 Conclusions**

7.1 In encouraging this application for business uses MHPS need to ensure that any approval does not result in the ability for the site to benefit from any permitted development options enabling a change of use to residential development.

7.2 The Government published a consultation document late in 2020 on proposals to update permitted development rights to reflect Classes E & F. Within this consultation, there was a

suggestion to be able to convert from Class E offices to residential use. The details were not part of this consultation; therefore it is important to ensure the position is avoided in case the detail would facilitate a change of use to residential development without following due process.

7.3 We are in general support of this application, subject to the comments above and subject to the inclusion of a condition ensuring that the employment use cannot make use of any potential permitted development rights to convert the buildings to residential development.

7.4A condition along the following lines would be appreciated:

"The buildings shall remain in Class E(g)(i). E(g)(iii) and/or B8, in the manner shown on plan reference \*\*\*\* in perpetuity and for no other purpose."

7.5 There needs to be some caution and we trust the planning authority will take these crucial points into consideration in their recommendations to the planning committee.

Yours sincerely

# John Living

John Living Honorary Architect

On behalf of the Planning Group Mill Hill Preservation Society

In conjunction with Barker Parry – Planning Consultants