

Shaikh, Mumtajbanu

From: [REDACTED]
Sent: 05 September 2014 11:47
To: Shaikh, Mumtajbanu; Prince, Dave
Cc: [REDACTED]
Subject: Fw: Your Ref B/04204/14, Arthur House, Barnet Lane, London N20 8AP

Dear Ms. Shaikh

4th September 2014

We would refer to your advice of the 14th August 2014 and our subsequent meeting and set out below our strong objections to this Application:-

1. Objectors Address :-

[REDACTED]

2. Telephone Number [REDACTED]

3. REQUEST TO SPEAK AT PLANNING COMMITTEE.

4. OBJECTORS NAMES [REDACTED]

5. E Mail Address [REDACTED]

May we also refer you to previous correspondence submitted and exchanged between us in respect of the earlier Application(B/000982/13), subsequently refused, a point we will refer to in greater detail below, your advice of the 4th August 2014 refers.

We would now submit this as our formal strong objection and set out below our specific Points of Objection and serious concerns:-

1. Development in a Conservation Area

The Subject Application relates to Development in a Conservation Area which by its definition under the relevant Town and Country Acts is an area where further development is to be resisted, avoided and discouraged other than under exceptional circumstances.

We would strongly submit that the application before your Authority is not relating to exceptional circumstances despite the Applicants assertions!!

Furthermore it would be in Direct Contravention of and contrary to Policies CS NPPE, CS1 and CS5 of the Local Plan Core Strategy (adopted September 2012), Policies DM01 and DM006 of the Development Management Policies DPD (adopted September 2012), the Totteridge Conservation Area Character Appraisal and the Residential Design Guidance SPD (adopted April 2013).

2. Decision Given by Chipping Barnet Area Planning Committee on the 28th July 2014.

As you advised in your letter of the 4th August 2014, the Application (Your Reference B/000982/13) was refused!

This was despite an Officers Recommendation To Approve predicated on what was, as I stated at the Committee Meeting, an "Inherently Flawed Officers Report"

This matter is the subject of on going correspondence between Ourselves, Members and your Senior Officers.

Not only was it refused (very correctly, in our view, having regard to all relevant factors) but the Wording of the Committee's Decision was empathic and unequivocal in the extreme in its terms and can only be taken as a Very, Very Compelling Precedent for any future Applications for the Development of this site, such as the current one. Particularly so when one refers to the Deposited a) The Demolition and Construction Method Statement and b) The Design and Access Statement both of which we will refer to in greater detail below.

For the sake of good order and completeness we attach your letter of the 4th August 2014 as Attachment 1 to the hard copy of this letter.

3. The Existing Property

The subject property is a substantial, characterful structure.

If I may take you to Your Report to the Planning Committee Meeting of the 28th July 2014, Page 131, headed "Loss of existing dwelling" you state that the building is in keeping with the architecture so evident in the immediate and wider area of the Conservation Area and in our STRONG SUBMISSION should be retained, remodelled and refurbished for which there is obvious and great potential, not demolished and rebuilt with all the consequential adverse, detrimental and injurious affection that such a process would cause to the neighbouring Property Owners within the Conservation Area.

It is to be commented that the owners are playing the old Developers Trick of allowing the Property and Garden to fall into disrepair and neglect and should be prevailed upon to remedy the position forthwith. We would also refer you to the Conclusion set out in The Deposited Sustainability Statement in support of our contention.

It is to be unequivocally stated that the Property is not Derelict, purely as we state, in disrepair and suffering neglect, as a direct result of the Owners wants of repair and omissions.

Structurally it appears sound, this is said by a retired Chartered Surveyor, and is capable, viably of remodelling and refurbishment.

We would caution you not to be duped by this old and well known Developers trick! In fact one of the oldest in the book.

4. Traffic

Barnet Lane is a heavily trafficked thoroughfare. We are sure your own Authority's traffic flow figures will prove and bear testimony to this, irrefutably.

Any impediment to traffic flow that would be caused during the demolition and rebuilding process is to be deplored, deprecated and avoided at all cost!! Despite the Developers untenable unsustainable and unachievable claims as set out in the Supporting Documentation.

Moreover allowing the proposed development would cause, undeniably, much impediment during the demolition and construction process due to the inherent access problems of the site.

It must be of great material concern that your Authority, has, by their "Delegated Officer Approval Mechanism" recently given Approval to the demolition and rebuilding of Waen Havon, Barnet Lane and 1, The Pastures.

Both these properties are in close proximity to Arthur House, The Subject Property.

Moreover Rebuilding Work is in train in respect of a further property in The Pastures and an Application (Your Ref B/04354/14) has been lodged with Your Authority for the demolition of 18 The Pastures and the construction of Four Storey Dwelling, again wrongly described in your letter of the 12th August 2014!!

In fact work is presently underway on 1, The Pastures with many, many traffic movements of heavy lorries along Barnet Lane, the obvious resultant generation of noise and dust emanating from the progress of work as prophesied by us in correspondence to your colleague Adam Ralton. This situation can only be greatly exacerbated should this and further Applications be approved.

To approve a or any further Application for Demolition and rebuilding of the Subject Property, would we strongly suggest show your Authority as failing in their duty as a competent and responsible Planning Authority and be open to an Action for Judicial Review as they would clearly be rendering and subjecting residents of the Conservation Area to all that the definition thereof seeks to protect and avoid!! Particularly so having appropriate regard to and due cognisance of the previous Committee Decision as referred to above!!

Further reference is made to this concern in 7.B) below.

We submit that the proposal would demonstrably harm the amenities enjoyed by local residents, in particular, safe and available on road parking, valuable green space, privacy and the right to enjoy a quiet and safe residential environment.

5. On Street Parking in the Immediate Area

Parking in the immediate area is at a premium, on street, and undoubtedly building and construction workers employed on site would park in these thoroughfares over the long period of the proposed contract period thus exacerbating and putting excessive pressure on an already pressured situation in White Orchards and The Pastures and occupiers of properties therein. Again this situation will be greatly compounded when work proceeds in The Pastures on a further one, possibly two, developments.

We submit that the proposal would demonstrably harm the amenities enjoyed by local residents, in particular, safe and available on road parking, valuable green space, privacy and the right to enjoy a quiet and safe residential environment a situation which has already been deleteriously affected by consents already granted by your Authority.

Exacerbation of the position cannot be allowed or permitted!!

6. Prejudice .

The points made and envisaged under 4. & 5. above would cause prejudice resulting in detrimental impairment to the quiet enjoyment by adjacent owners of their properties and such prejudice should not be caused as it is contrary to the precept that the amenities enjoyed by local residents, as stated above, in particular safe and available on road parking, privacy and the right to enjoy a quiet, safe and peaceful residential environment.

It is in fact a matter of Law that all Property Owners have a Right to Quiet Enjoyment of their Owned Properties. We would also refer you to The Human Rights Act, under which your Authority have responsibility, in particular, Protocol 1, Article 1 clearly states that a person has the right to peaceful enjoyment of all their possessions, which includes their home and other land

7. The Proposed Detail of The Application

Having regard additionally and specifically to the design of the proposed structure and from reference to the Deposited Documents, we would accordingly submit that:-

A) Description

Whilst described in your advice of the 14th August 2014 as a "2-storey dwelling house with rooms in the roof space and basement", a description we have already taken issue with your Office over:-

It is, in our submission, despite Mr Prince's advice of the 27th August 2014, a FOUR STOREY STRUCTURE! Indeed as was the structure proposed in the previously resoundingly refused Application (Your Ref B/000982/14) which we would strongly submit was wrongly described in that Application!!

Another flaw!!

B) Access

It is intended to use the existing one point of access onto Barnet Lane during and following completion of the Construction Process.

We have already made comment on this in 4.above and will comment further below in addressing the many errors in the Deposited Design and Access Statement.

The previous occupiers had one vehicle which was garaged,hence one parking space,as the area in front of the garage was required for access thereto.

They were unable to enter and leave in a forward direction causing disruption of Traffic flow on egressing the property to users of Barnet Lane due to the fact that the Lady of the house would have to take up position on the other side of the Barnet Lane to ensure the Driver had safe passage from the point of access onto the Highway,on many occasions stopping traffic flow !

The Deposited documents incorrectly refer to there being some 6 existing car parking spaces,which might include the garage.

This is lacking veracity totally!! I again inspected the site only yesterday!

Having regard to this we are also confused by Mr Prince`s reference - point h)in his Email of the 27th August 2014,wherein he refers to a 1:1 ratio being acceptable and further states that the question was considered acceptable on Highway Grounds as stated in the "report".I can see no specific reference to this!

The Application refers to there being a provision of 5 spaces including 5 retained.We are unclear from the drawings if this figure includes or not the spaces in the Garage,which appears to be of triple size.

Perhaps you could clarify please?

Even a 5 for 1 replacement ratio,in view of the extreme danger of this point of access, can only be a threat to road safety and life and limb!!!Indeed a great threat.

Eight would compound and exacerbate this extremely already serious concern by geometric proportion. Moreover the increased parking provision be it 5 or 8 would undeniably have traffic implications in respect of the already precarious junctions of Barnet Lane with The Pastures and White Orchards.

C)Scale and Massing

It can only be strongly stated that [REDACTED] who frequently walks our dogs in the Conservation Area, advises that she has not seen a property of such overwhelming magnitude as that being proposed in this Application,generally and specifically in such close proximity to neighbouring properties, as the Proposal envisaged in this Application would be in relation to our property.

The previous Application was refused, amongst other very valid reasons,for its overbearing scale and proportion!

It is to be noted that the size of accommodation proposed,if we may take you to the Design and Access Statement as deposited,which states that the footprint will be 442 sq.metres/4757sq.ft.,precisely the same as the footprint specified in the Design and Access Statement deposited in connection with the previously correctly refused Application (Your Reference B/000982/14)!!

This ,for the reasons set out below is incorrect.It is in fact larger in terms of footprint area and overall cubic content !!

It is noted that whilst the space between The Application Structure and Searles Field(to the left of the site) has been increased slightly,the space between our property and the Dwelling as proposed has also been very marginally increased relative to the previous Application,which was refused, but remains very close and moreover as we point out below the height of the entire structure obscures our views and and natural light whereas the previous Scheme had buildings of much lower height in that location.

Hence [REDACTED] apposite comments above.

If we may take you to your Report to Committee of the 28th July 2014, we would make specific reference to the Penultimate Paragraph on Page 133,Headed "Views"!

In the first few lines of the relevant passage you refer to the importance of Space around buildings.The Application you were reporting on did not meet this criteria and neither does the current Application.It is irreconcilable!!

We would therefore contend strongly that as such, the proposed development is in direct contravention of your Authority`s Policies,as it does not respect local context and street pattern or in particular ,the

scale and proportions of surrounding buildings and would be entirely out of character of the area, to the detriment of the local environment.

Planning Policy Statement 3 provides, as we are sure you will be aware, in paragraphs 13 and 14 "that good design should contribute positively to making places better for people. Design which is inappropriate in its context, or which fails to take the opportunities available for improving the character and quality of an area and the way it functions should not be accepted.

The Frontage would appear to scale – 19.202 metres/ 63 feet and the Depth – 14.935 metres/ 49 feet for the main structure, and 17.678 metres/ 58 feet overall.

This is to be compared with Dimensions given for the Refused Application (Your Reference B/000982/14) This had a frontage of 19.66 metres/ 64 feet 6 inches (it is to be noted that in your Report to Committee of the 28th July 2014, Page 133 you gave figures of 67 feet 6 inches/ 19.4 metres which is incorrect – another flaw) and a depth of 15.2 metres/ 49 feet 11 inches for the main structure a small reduction only in terms of the previously proposed main structure, but greater in terms of the overall depth of construction. In terms of height the previous proposal had a stated height of 8.8 metres/ 29 feet 11 inches whereas the current Application appears to have a height of 9.45 metres/ 31 feet

For ease of Comparison we set out in table form the relevant dimensions. It is to be stated that the figures given above and set out below are taken from page 133 of Your Department's Report to Committee of the 28th July 2014. It is however to be commented that there is repeated reference to a previous proposal such references are the subject of correspondence between us your office, Members and Senior Officers as in our submission they were inadmissible, prejudicial, seeking to misdirect and unworthy of Competent Officers!!

The figures given for the current proposal are ones we have taken from the Deposited Plans!

	Current Proposal	Proposal Refused 28th July 2014
Height	31 feet/9.45 metres	29 feet 11 inches/8.8 metres
Frontage	63 feet/19.202 metres	64 feet 6 inches/ 19.66 metres
Depth on Right	58 feet/17.678 metres	49 feet 11 inches/15.2 metres
structure)	(50 feet/15.24 metres	(for the main
	for the Main Structure)	
Site frontage		
/width	108 feet/32.91 metres	108 feet/32.91 metres
Site depth	261 feet/79.3 metres	261 feet/79.3 metres
Building line	49 feet/14.935 metres	42 feet 8 ins/51 feet 2 ins
		to 13 to 15.6 metres
Distance between High		
Elms Boundary and proposed		
structure		
*** (See Below)		
a) at front	14 feet /4.268 metres	13 feet 4 inches
		/4 metres
b) at rear	12 feet /3.658 metres	9 feet 11 inches
		/3 metres
Distance between		
Perimeter Wall of High		
Elms and Proposed		
Main Structure		
a) at front	34 feet /10.363 metres	Not Available
b) at rear	34 feet/10.363 metres	Not Available
Length of Main		

Structure extending along boundary of Garden to High Elms Footprint as Per Deposited Design and Access Statement for both Proposals	32 feet /9.7536 metres	Not Available
	4757 sq. ft./442 sq. metres	4757 sq.ft./442 sq. metres

As will be evident from this Data the Current Application relates to a Structure of greater scale and massing (save for a minor reduction (2.38%) in width but of greater depth) than the previously Refused Application and as such is in again in total conformity with the all the reasons for refusal given forcibly in the Refusal Letter attached as Attachment 1 and should also be refused.

We would in fact state that in view of this it is extremely surprising that this Application is being processed!

Inherent in this, is the obvious fact that the extensive scale and massing of the envisaged structure, will entail an extended Construction period with the obvious impact on the issues raised in 4.) Traffic and 5. On Street Parking in the immediate Area as set out above.

*** It is to be noted that in the previous proposal the section of the envisaged New Build, as stated above, extending along our Garden boundary was not the full height of the structure as is now shown to be proposed, which is a cause for great additional concern and prejudice, all as referred to below!!

The foregoing will prove beyond all reasonable doubt that the current proposal remains an Overdevelopment of the site and as set out in our "Attachment 1" to quote directly "The proposed replacement dwelling, by reason of its siting, mass, bulk and design would result in a cramped, overly prominent building in this part of the Totteridge Conservation Area and constitute an overdevelopment of the site. It would not preserve or enhance the character or appearance of the conservation area and would be detrimental to the character and appearance of the street scene.....etc."

In response to a point made by a Member at the Planning Committee Meeting on the 28th July 2014, the current Application the totality of the dwelling has been set back further into the site.

The consequence of this is that the right hand flank walling of this FOUR STOREY STRUCTURE, as proposed, extends into the site for the total depth of our garden..

The obvious deleterious consequences of this are that:-

a) Our Natural light and the views from our rear windows will be taken, having been enjoyed by this property for at least 50 years (it was constructed in the late 1960 s.)

Moreover our currently clear view of Sun and Sky will be lost as the proposed building will completely dominate the garden of our House, resulting in the loss of any views that we currently enjoy of skyline and trees to the left of our house and replaced by the dominating view of a long, tall, intimidating and cold -- "Berlin Wall" -- totally contrary to that which is acceptable in a Conservation Area and which we had always considered a beautiful semi rural residential area --, overshadowing most, if not all of our garden.

This would be an infringement of our Human Rights and urge your Authority to carefully consider their responsibility under the provisions of the Human Rights Act, in particular Protocol 1, Article 1 which clearly states that a person has the right to peaceful enjoyment of all their possessions which includes their home and other land.

We believe the proposed development would have an exceedingly dominating effect and impact on us and our right to quiet enjoyment of our property.

Article 8 of The Human Rights Act patently states that a person has a substantive right to respect for their private and family life. This principle was tested, reinforced and confirmed in the Case of Britton vs SOS

b) We will look out and along the garden at a "Prison Wall" and in turn be seriously overlooked and lose privacy.

The Deposited Plans provide that there will be 1 Window at Ground floor, 2 at First Floor and 1 at Second Floor looking on to our property!

Furthermore we submit that the Application relates to a proposed development that is in contravention of the District Wide Plan (Policy 6.8) in that adequate privacy is not afforded to the occupants of adjacent residential properties, particularly with regard to their right to quiet enjoyment of their property.

Moreover as we have stated above and restate here for the avoidance of doubt this would be an infringement of Article 8 of the Human Rights Act and the provisions thereof as confirmed and reinforced by the Case of Britton vs SOS.

E) Tree Survey

No tree survey has been made available to us and as far as we can establish has not been lodged.

This in itself is grounds for refusal as the Application fails to conform to requirements for the making of any Planning Application.

However it is of great moment in this case as excavation is envisaged in the Application for the creation of basement accommodation. We will make reference below to our concerns regarding the impact on the stability of our house but wish here to state in absolute terms that the allowing of the proposed development will have serious effects on trees growing within our garden close to the boundary with the subject property.

You will, we are sure, be aware that most trees in this Country have a significant radial root system, sometimes extending to 1 to 1.5 the height of the tree. Severing just one of a tree's major roots during deliberate or careless excavation to facilitate the creation of the basement area can cause the loss of up to 20% of the root system, undermining its water absorption and also leaving it vulnerable in high winds threatening the safety of our property and ourselves.

Moreover the loss of any live trees is to be deprecated particularly in a Conservation Area.

Your Authority cannot possibly be an accessory to this likely eventuality and condone such consequences by allowing the Application.

It would in fact be contrary to and in direct contravention of your Authority's Policy DM01 of the Adopted Barnet Development Management Policies D P D (2012) and CS 5 and CS 7 of the Adopted Barnet Core Strategy D P D (2012) and 7.21 of the London Plan 2011!!

These Policies are also relevant in the context of possible harm or injury to trees within our demise but whose root systems will be affected by excavation as referred to above!!

Moreover our contention and strong submission is that allowing the Proposal would be a breach and contravention of your stated Policy "To Protect or enhance the local environment, including wildlife habitats, trees and woodlands, parks and Gardens".

F) Threat to Stability

You will be as aware of the nature of the local ground conditions, as we are, that we reside in an area where the soil is London clay with all the problems resulting therefrom.

In view of the proximity, scale and mass of the proposed 4 STOREY DEVELOPMENT and the fact that VERY extensive excavation would be involved on a site sloping to the rear in connection with the creation of a Basement area and swimming pool, we can but conclude that this can only threaten the structural integrity of our property, with implications regarding our safety, wellbeing and contravening the Human Rights Act as referred to above.

G)Design and Access Statement

May we point out that the document deposited is a "Carbon Copy " of the document deposited dated 21st February 2014.It is word for word a duplicate and repeats the errors and omissions of the earlier document.

As stated above the footprint is given as 442 sq.metres/4757 sq.feet!

Are we really considering the same proposal that was so resolutely refused on the 28th July 2014?

In 2.2 reference is made to a document previously lodged in connection with the previous Application!.

We are at a loss to reconcile the properties referred to in 4.1 with reality!!Moreover all the Documents referred to have not been made available for consideration by interested parties and as referred to above should have been as part of the Consultation Process!!

We have already questioned the statement made in 3.1 in Section 3 above (Existing House)and make further reference in I)(Sustainability Statement)below.

The Statement made in Section 3 (Sustainability)is refuted absolutely for the reasons so clearly and appositely rehearsed in Section C) Scale and Massing,above.

Again the data provided in 4.2 relates to the Previously Refused Scheme.

We again totally refute the Statement made in Section 6 other than in respect of Size as indeed we do in respect of the Statement made in 7.4.

We think it is commonly and widely known and accepted that the Building Industry in this Country is much reliant on the Services of non local and non national labour and hence the point maintained is flawed.

Reference is made to the Arboricultural Method Statement but this has not been made available as pointed out in E)Tree Survey above.

Moreover the points made in Section 11 thereof are flawed and lack veracity totally and absolutely particularly in regard to "harmonious" and further to "neighbouring buildings."

H)Demolition And Construction Statement

Again it is to be stated that the Deposited Document displayed on your web site is a "Carbon Copy" of the one deposited in connection with Previously Refused Application dated 21 February 2014!

For the reasons stated above, the statement made in section headed "General Construction Impact" is impossible to achieve and are unrealisable, as indeed are the statements made in the Section headed "Public protection".Who are they trying to misdirect?

In the section headed Avoidance of dust,we question the effect on roads of wet wagons entering Barnet Lane generally and particularly in conditions of snow and ice.

Who will enforce vehicle emissions and delivery times.These are unsustainable in the extreme.

We suggest as will be obvious to the world and one,having regard to the location and access to the site the claims made in regard to Vehicles entering the Site are equally unsustainable.

We have already dealt above with the claim made in regard to Vehicle Wheel Washing and Cleaning and can but emphasise the point in terms of road safety and dare one say, in view of the busyness of Barnet Lane a real risk to road safety and life and limb as this should be obvious.

Also one can but question the facilities for draining the surface water and the possibilities of water egress from the site onto Barnet Lane and neighbouring property.

No Statements are made in any of the deposited documents for the arrangements for the parking of workers vehicles hence our concerns made in our Section 5)above!!

I)Sustainability Statement

Reference has already been made above in 3) The Existing Property in this regard.

It is to be again stated that the Property is not derelict,as maintained in the conclusion of this Document,but has been allowed to fall into disrepair by the Owners neglect and is beneficially capable

of, in our Strong Submission, being refurbished, remodelled at a fraction of the cost of the rebuild envisaged in the current Application.

Their measure of Viability is based on resultant projected profit not True Viability.

Maximisation of Profit should not and cannot be a Planning Consideration!!

J) Conditions

It is, we acknowledge, usual for Your Authority, in common with many others to impose and attach Conditions to any Planning Consent.

This is a Practice, which for reasons clearly set out we can but question.

Such conditions require further details in respect of specific elements of the scheme submitted for consideration at a later stage. A number of such conditions are Prescriptive and require compliance but no further details are required.

This in our view that is an abdication of your responsibility to prosecute fully the Application notwithstanding the commonality of the use of Conditions and an abrogation of the Application or elements thereof away from Committee To Enforcement Sections.

We attach as Attachment 2 to the hard copy of this letter a copy of Mr Boateng's letter of the 13th August 2014 and would make specific reference to his advice in the second paragraph.

In your Department's Report to Committee dated 28th July 2014 reference is made on Pages 117 through to 122 to many proposed Conditions relating to matters such as:-

a) Commencement

b) Materials

c) Levels

d) Enclosure of the Site

e) Operational Hours

f) Landscaping Conditions 7&8

g) Tree Survey

h) Excavations

i) Tree Protection

j) Vehicle Washing

k) Use Classes

l) Sustainable Homes Technical Guide

m) Demolition and Construction and Method Statement

It is to be stated, that in our submission, as admitted by Mr Prince in his note to me of the 27th August 2014, your Authority are unable to Police breaches of conditions and would also again make reference to the sentiments expressed in Mr Boateng's letter, attached as Attachment 2.

This, notwithstanding Mr Prince's advice "that this is not an area for which your Section has responsibility and has not for several years", does not in any way detract from our forceful point in this regard as it appears that your Authority are sanguine that Breaches of Conditions can only be acted upon if reported by Members of the Public, always assuming that the Public are aware of the relevant Conditions imposed. How Farcical.

The statement by Mr Prince would imply that a) the dimensions, levels and position of the Structure could be changed, b) different materials could be substituted, c) the root systems of trees could be damaged c) operational hours breached (and we could go on and on), all without the Planning Authority's knowledge, concern and consent!!

Our experience of Your Authority's manifest lack of enforcement of conditions imposed but not complied with for other Developments, both past and current, is being gracious -- "woeful" and just cause for our very, very real concern in this regard as we can be forgiven for having little confidence nor trust in the merit of such conditions protecting our quiet enjoyment of our property and as such a possible

infringement of our Human Rights and an abdication of your Authority's responsibilities in this regard as referred to in detail above.

This means that in respect of Matters a),b),d),e),j),k),and i)our foregoing sentiments apply absolutely as responsibility for compliance is devolved to the General Public!!

As to items g),h),i)and m) these relate to matters which should be available for consideration by interested Parties in order that they can make representations as part of the Consultation process.

In this regard we submit that you are acting Ultra Vires your Authority,which is actionable if ,as appears to be the case, repeated and a cause for Judicial Review!!

K) Other Objections

In your report to Committee of the 28th July 2014 you listed these on page 127.

We will not rehearse them but will firmly assert that the current Application will again attract all these objections, which were not properly covered in your Report consistent with my advices to Mr Prince.

We have set out above our strong objections to the Proposed Application.

In our strongest of submissions,any one of our grounds for objection should be cause for refusal.

Cumulatively they are incontrovertible and irrefutable.

As stated we are concerned that for many reasons the Application has,indeed,been processed, as it is undoubtedly,we submit,strongly,in Contravention of your Authority's own Planning Policies and the Provisions of the Human Rights Act.

Moreover many necessary Documents have not been lodged supporting the Application and hence The Proper Consultation Process has been denied to interested Parties.

This as, stated, is in itself amongst many other facets of the matter, grounds for a cause for Action for Judicial Review.

In essence and irrefutably the Proposal falls to be refused based on The Decision of The Chipping Barnet Planning Committee given on the 28th July 2014 in respect of Application B/00982/14

attached as Attachment 1 and the wording thereof,its empathic and unequivocal terms which can only be taken as a VERY,VERY POWERFUL PRECEDENT in this case having regard to the data set out above

in Section C)above and the sentiments set out therein and as stated having due regard to The Human Rights Act and your Authority's responsibility thereunder.

You might consider the foregoing to be somewhat lengthy and detailed.

We can but invite your understanding that it is so because it has been prepared as a document for the support of any necessary Action for Judicial Review which might be caused to be referred in respect of this Application and the matter of your Report in respect of Application B/00982/14.

We strongly contend that in all the circumstances, particularly having regard to what has recently gone before,that this Application should fall to be considered ,not at Officer Level only but by Committee,thus according with the Principles of Democracy(not Bureaucracy) and of the Doctrines of Natural Justice and The Human Rights Acts as enacted and re enacted

Please confirm receipt of our letter of Objection and that it will be placed on the record.

Yours sincerely



P.S .It is to be commented that as we are finishing this letter my wife has just witnessed a collision on Barnet Lane between a construction lorry and a car causing an extensive backup of traffic and long delays.As set out in 4.Traffic and 7.B)Access this occurrence is likely to increase very greatly if this Application is approved.