

FRIERN BARNET & WHETSTONE RESIDENTS' ASSOCIATION

and

THE FINCHLEY SOCIETY

North Finchley SPD Consultation,
c/o Planning Policy Team,
Strategic Planning and Regeneration,
2nd Floor,
Barnet House,
1255 High Road,
Whetstone
London NN20 0EJ

Submitted by email to forward.planning@barnet.gov.uk

26 November 2017

Dear Sirs

North Finchley Town Centre Framework Draft Supplementary Planning Document ("SPD") - Representations

We enclose a document setting out representations in respect of the SPD and submitted on behalf of the Friern Barnet & Whetstone Residents' Association (FBWRA) and the Finchley Society and additional representations are set out below in this letter.

North Finchley is the local town centre for our members and accordingly its future development and vitality is important to them. During the public consultation period FBWRA and the Finchley Society have worked together to review the draft SPD in detail and we have also included articles discussing the SPD proposals in Newsletters circulated to all our members and together we have held a joint members' meeting to discuss the proposals, which was attended by representatives of the Council's consultants (BDP) and the Council (Re). The meeting attracted an audience of more than 100.

Whilst FBWRA and the Finchley Society both recognise the need to revitalise the North Finchley Town Centre, and for an appropriate town planning environment to facilitate the process, and thus give the SPD a cautious welcome, we have significant concerns about many of the SPD proposals and we consider that the existing document requires substantial changes in order to be acceptable. The current draft SPD is inadequate in many respects, and should be seen as merely a starting point, not as a destination.

The enclosed document sets out our concerns and comments in detail but we believe that it is appropriate to highlight the following-

A. Development Proposals

1. Market: Further precision is required as regards the market. The SPD should specify the size of the area occupied by the current market (including parking for traders' vehicles), and the size of the area required to be provided as a substitute location for it. It is our belief that the proposed new courtyard space as shown on the plans included in the draft SPD is too small to be an adequate replacement.

2. Bus station: Further detail is required to demonstrate that the policy of closing the bus station is actually realistic. The lack of proper proposals for either a relocated bus station or for an alternative- presumably for buses "simply" to stand on the streets (and staff rest facilities and passenger waiting facilities would still be required, but where?) -is a major challenge to, and undermines the credibility and validity of, the SPD proposals.

3. Traffic Management: As an over-riding priority, no roadspace reallocation or other proposal impacting on traffic flows through North Finchley should be put into effect where it would reduce the volume of through traffic the High Road /Ballards Lane are able to accommodate. Further, the SPD fails to give due recognition to the role of the High Road (A1000) as a key corridor for the movement of emergency vehicles – particularly ambulances . The existing "allocation" of roadspace to traffic, by offering an effective carriageway width of, at many points, more than just two lanes, frequently offers emergency vehicles the opportunity of manoeuvring around congestion and also the possibility for stationary traffic to move aside to permit the emergency vehicle to pass. This flexibility would be impaired or eliminated if roadspace were to be "reallocated to..footway widening...narrower road crossings, street planting, bus waiting facilities and cycle lanes."

4. Cycling: The SPD contains no specific proposals for cyclists. This is understandable, given the overall lack of detail in the document, but what is lacking is a realistic evaluation of whether or not the provision of features such as cycle lanes is both desirable and practicable in the context of the crowded space comprising the town centre.

5. Parking supply during redevelopment: The SPD is silent as to measures to offset the loss of more than 45% of the total town centre off-street car park capacity whilst Lodge Lane car park is redeveloped (KOS6). This is unsatisfactory- it suggests the issue has not been addressed.

The SPD must be revised to include a clear policy statement and explanation of how car parking will be managed during the entire redevelopment process (not merely that of KOS6).This is necessary in order to re-assure local residents, drivers, businesses and other stakeholders that the town centre will not be strangled by a major loss of car parking capacity during redevelopment.

6. Parking supply- general: Lack of readily available car parking is a major issue for both local residents and visitors to the town centre (whether workers, shoppers or those pursuing leisure and cultural activities). Whilst the proposals for encouraging more efficient use of existing car parking spaces are welcome, we believe that the opportunity should be taken to seek ways to expand the number of parking spaces by modifying the proposals for the development of Lodge Lane car park

(KOS6) to provide for a significant increase in the number of public parking spaces at that location- maintaining the status quo is not enough.

At our members' meeting to discuss the SPD (see above) the lack of available car parking in North Finchley was a major concern and there was a demand for action by the Council to increase supply. There is a widespread perception that lack of easily available parking is a major cause of the decline of the town centre and that immediate action should be taken by the Council to deal with this.

7. Height of buildings: The proposals for tall buildings at various KOS locations are inappropriate – for example, in the case of KOS 1 any tall building here would exacerbate the issues arising from the Arts Depot building and, in its own right, would also be overbearing by virtue of its height and bulk, out of keeping with the typology of neighbouring buildings and likely to introduce unacceptable levels of shading to neighbouring roads and buildings. Further, the proposal for a tall building on KOS1 fails to recognise that this section of Ballards Lane is narrow – another tall building (in addition to the Arts Depot) would introduce an unacceptable sense of enclosure.

Similar issues arise on other sites proposed for tall buildings.

Generally redevelopment of sites currently identified as locations for tall buildings should be limited to no more than 6 or 7 storeys (and less in certain parts of the sites concerned).

8. Wind tunnel effects: The SPD recognises further wind tunnel effects may arise, but is weak in the proposed handling of the issue. It should be made clear that wind tunnel effects arising from development proposals must, as far as possible, be eliminated, not merely mitigated. This issue was one that was frequently and forcefully raised by speakers from the floor at our members' meeting.

9. Lack of precision: Certain provisions of the draft SPD conflict with the objectives set out in the document or are lacking in clarity or are inconsistent. These issues need to be eliminated by redrafting.

10. Residential units: The SPD is silent as to the anticipated numbers of new residential units that would arise from the developments contemplated in the document. Whilst it is appreciated that it is not possible to be definitive on this in a high-level document such as this, an indication of anticipated /target numbers for each KOS, and in the aggregate would be appropriate to assist in forming an appreciation of the scale of change that may come to North Finchley. The potential number of new units is important because upon this figure will depend the demand that will be created for new health and education facilities.

11. Social infrastructure: The SPD makes no specific provision for new health or educational facilities. Whilst it is accepted that a new school would be difficult to accommodate in the town centre (although expansion on existing school sites may be practicable), this is not the case with a health centre and the SPD should make specific provision for a new health centre on a specific site. The Council argues that the provision of such facilities is not its responsibility, but rather that of the NHS. However, in a town planning context it is the Council, not the NHS, which is responsible.

The reference on page 41 of the SPD, to potential uses of part of Lodge Lane car park as including “for example health or similar uses” is unacceptably weak. The revisions to the SPD should identify a specific location for a new health centre.

12. War Memorial: The War Memorial stands in front of the United Services Club building, “St Kilda’s”, a 19th century house, acquired by the USC in 1921, and which as currently proposed, would be demolished, along with the offices to the north of the Memorial.

We strongly object to the proposal for two reasons-

1. The current proposal in the SPD would mean the Memorial would lose its current historic and contemporary setting and would have a large and alien new building of up to 12 storeys as its “backdrop”. Such a new building would be insensitive to the Memorial .
2. During the course of our enquiries in connection with the SPD, it became apparent that the building “St Kilda’s” is in fact the original War Memorial at this location. It was purchased in 1921 by the USC to be used as an institute or club as a war memorial for the use of servicemen, ex-servicemen and others. As the original Finchley War Memorial St Kilda’s is an important monument to the sacrifice of the men of Finchley in the Great War and so it should be retained. It is a part of the collective memory and social history of the people of Finchley.

The location of St Kilda’s, at the southern end of KOS2 means that it can be excluded from the site without impairing the integrity of the remainder of the site.

The proposal for KOS2 should be changed so that-

- A. “St Kilda’s” is retained and excluded from KOS2 and from any compulsory purchase and
- B. any new building constructed on the remaining part of KOS2 is of a design such that its height reduces towards” St Kilda’s”, so that the new building is not overbearing in relation to either the Memorial or “St Kilda’s” and so that an “urban canyon” is not created at this gateway site.

In addition to the above, St Kilda’s, should be designated as a locally listed building on account of its historic interest and perhaps also as an “Asset of Community Value”.

B. Process

1. Traffic Study: The lack of a technical traffic study and the lack of a demonstrably workable traffic scheme constitute a major challenge to, and undermine the credibility and validity of, the SPD proposals.

For the SPD to be acceptable, it must contain a clear- and short – timetable, driven by the Council, not developers, for the completion of a full traffic study and the subsequent formulation (including public consultation) of a highway plan

2. Phasing : The SPD deliberately contains no specific phasing strategy. This omission is a mistake as the nature of the SPD proposals requires that at least an element of phasing should be set out as mandatory requirements, thus:

- before the Lodge Lane site (KOS 6) is redeveloped the market must be reprovided at its new permanent location and adequate temporary public parking provided to replace the spaces in Lodge Lane car park until the replacement car park on that site is fully open for public use (in the absence of other suitable proposals, the phasing should include a requirement that the buildings on another

large KOS are cleared, and that KOS used as a temporary public car park, whilst KOS6 is redeveloped);

- if the market is to be relocated to the proposed new public space at KOS1, then KOS1 must be redeveloped before KOS6;
- because of the importance of the proposed new public space that is suggested for it, before redevelopment of KOS1 a workable traffic scheme encompassing the Ballards Lane and related proposals of the SPD must be fully developed and any preconditions satisfied ; and
- before change of use of the bus station is permitted, satisfactory permanent new arrangements for buses must be put into effect.

3. Blight: The adoption of the SPD will create planning blight, particularly because of the proposal for use of a CPO for site assembly. Para. 8.19 of the SPD states CPO will be considered “especially but not exclusively in the Key Opportunity Sites”. This lack of precision may provide useful flexibility, but it creates unacceptable uncertainty for both owners and occupiers throughout the whole of the SPD area. The SPD should identify those parts of the SPD area where CPO powers will not be exercised and ideally should provide that use of CPO powers will only be considered for Key Opportunity Sites and highways works.

The SPD should contain a “sunset provision” for the use of CPO powers, so that blight of those parts of the SPD area where such powers might be exercised is time-limited. This would also encourage development proposals to be brought forward without undue delay.

4. Masterplan: It must be open to anyone to submit planning applications in conformity with the SPD development proposals. It is unacceptable to impose a requirement that proposals must be “accompanied by an overall masterplan” as this is likely to operate unfairly as only a party which secures control of key sites will be able to provide such a “masterplan”.

Yours faithfully,

David Thompson

For and on behalf of Friern Barnet & Whetstone Residents' Association

Peter Pickering

For and on behalf of the Finchley Society