

Friern Barnet and Whetstone Residents' Association and the Finchley Society-

Schedule of representations concerning the North Finchley Town Centre Framework Draft Supplementary Planning Document ("SPD") 26 November 2017

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1	17	4.1 a Vision	The supply of housing will be significantly boosted ...supported by improved community provision including health and education	<p>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.</p> <p>Upon this figure depends the demand that will be created for new health and education facilities; which if there were anything like 2,000 new units (perhaps 6,000 new residents) would be large. However 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</p>

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				<p>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, 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.</p>
2	18	Objectives		
2.1	18	Theme 3 - Town Centre People 2	Proposals for improved community facilities will be supported within the town centre, particularly health and education to cater for any increased population.	See above. “will be supported” is unacceptably weak, as it leaves the initiative to others – and such a proposal might not be forthcoming
2.2	18	Theme 4- Town Centre Movement 15	Encourage local people to stay local for shopping, leisure and amenity purposes to minimise car use and parking demand on North Finchley’s streets	If “the vision” is realised and North Finchley plays an enhanced role in serving North London with more local people coming to North Finchley rather than going e.g. to Brent Cross, this will surely increase parking demand. The

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				SPD does not adequately address this.
2.3	18	Theme 4- Town Centre Movement 17	“Addressing the impacts of present vehicle domination...whilst recognising the A1000 as an important traffic carrying corridor”	Refer to the comments below at paras 10.1-10.8 . In order to re-assure local residents, drivers and other stakeholders, the SPD requires the addition of a policy statement that, as an overriding priority, no roadspace reallocation or other proposal impacting on traffic flows through North Finchley will be put into effect where it would reduce the volume of through traffic the High Road /Ballards Lane are able to accommodate at any time throughout the day,
3		KOS 1 Tally Ho triangle and Arts Depot		
3.1	23	6.2	The public realm between the Arts Depot and Rex House ...suffers from the uncomfortable wind conditions as a result of the adjacent tower	Wind conditions are a very important consideration and are not given adequate weight in the SPD. We held a joint members’ meeting for members of FBWRA and the Finchley Society, to discuss the SPD, and which was attended by representatives of BDP and the Council (Re). The issue of wind conditions around the Arts

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				Depot and elsewhere was one that was frequently and forcefully raised by speakers from the floor of the meeting.
3.2	25	6.5	The north of the site has potential to become an area of increased leisure led activities...potentially including a small in town cinema... A new courtyard space should be provided...	<p>There is a potential conflict between leisure uses and adjacent residential occupiers.</p> <p>In addition to the proposed new courtyard space, consideration should be given to the formation of a new/ expanded public space to the north of the Tally Ho pub, and perhaps incorporating part of what has fairly recently been made an enclosed and apparently private garden area.</p>
3.3	26	6.6	Buildings to the south-east of the site have the potential to reach up to approximately 12 storeys in height...	Greater certainty is required with regard to building height. What does “approximately 12 storeys “mean? 14, 16, 18? Developers will inevitably seek to maximise the amount of floor space/residential units on the site and yet a key role of the SPD should be to eliminate costly planning delays by providing certainty as to what will be acceptable. Para 6.6 should be amended to read “ to reach up to not more than 6 storeys....sloping down to 3 storeys in the more sensitive northern part of the site and along the whole of the frontage to Ballards

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				<p>Lane” . This would mean the Council deciding what maximum height is appropriate and specifying this in the SPD- and as to which see below.</p> <p>The proposal for a tall building (or buildings) on KOS1 is unacceptable. Any tall building would exacerbate the issues arising from the height of 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 would be likely to introduce unacceptable levels of shading to neighbouring roads and buildings. The proposal for a tall building on KOS1 fails to recognise that this section of Ballards Lane is narrow – another tall building would introduce an unacceptable sense of enclosure.</p> <p>Buildings on KOS 1 should be no greater than 6 storeys in height (and that subject to no material adverse effects on neighbouring buldings or the amenity of their occupiers arising), sloping down to 3 storeys in the northern part of the site and along the whole of</p>

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				the frontage to Ballards Lane
3.4	26	6.7	Any potential wind tunnel effects should be mitigated through design and orientation	It should be made clear that potential wind tunnel effects (and taking into account possible schemes of development for KOS 2) must, as far as possible, be eliminated , not merely mitigated .
3.5	26	6.7	The central part of the site at Nether Street would be suitable for contemporary buildings of high quality design	The required design standard should be “exceptional high quality”- refer to page 18, Objectives Theme 1, para 5
3.6	26	6.8	The new courtyard space should be a welcoming public space of a size and proportion to be able to accommodate occasional speciality outdoor market stalls and outdoor seating. The design of the space should be considered together with the transformation of Ballards Lane into a one-way shared street which encourages pedestrian and cycle movement to Nether Street and Castle Road	<p>Greater precision is required as to the intended new location of the market (to be relocated from Lodge Lane car park).</p> <p>Further, are the “occasional speciality outdoor market stalls” that this paragraph contemplates similar in scale to the current weekly market, or larger, or smaller, and does “occasional” mean “weekly” or a lesser frequency- and if so, what?</p> <p>If the intention is that the new market would be a “speciality market” only then this should be expressly stated in the SPD- and equally if it is not the intention.</p> <p>The quality of the current market appears to</p>

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				<p>have declined in recent years. The SPD should establish an objective of reversing this decline, improving quality and making the market an attractive feature of the streetscene.</p> <p>Further precision is required as regards the market, including as to the size of the courtyard space. 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 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.</p> <p>It should also be noted that the "Development principles – Public Realm Strategy " in the SPD identifies alternative/ additional locations for the market near the Tally Ho Pub, near the War Memorial and "along Ballards Lane" (Page 50 and Fig. 28). The lack of precision will be relevant to the consideration of phasing of the various proposals in the SPD.</p>

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				<p>In addition to the Ballards Lane focussed new locations for the market, proposed by the SPD, relocating it to another car park should also be considered.</p> <p>The sentence beginning “The design of the space should be considered together with the transformation of Ballards Lane ...” requires clarification.</p> <p>In view of the implications of the “wind tunnel effect” for any courtyard or other open area in this location, it should be stipulated in the SPD that the design of any such courtyard or other open area must be such that any potential wind tunnel effects (and taking into account possible schemes of development for KOS 1) must, as far as possible, be eliminated.</p> <p>We believe that the form of the redeveloped KOS1 should be focussed on the proposed new courtyard area, with shops and restaurants fronting the open space, with flats above. The width of the site is not great and might not be able to accommodate a separate parade of units</p>

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				<p>fronting the High Road. In order to avoid dead frontage along the High Road we suggest that some shops/restaurants would be twin –aspect, opening on to both the courtyard and the High Road. It would be important to ensure that the scale and design of the upper floors was such that the courtyard was not oppressed by them, so height should be limited as discussed at para. 3.3. The courtyard should be light, not unduly shaded by the buildings, but sheltered by them.</p>
4		KOS 2 Ballards Lane/Nether Street		
4.1	29	6.12	<p>A comprehensive redevelopment of the site is proposed... Development should be sensitive to the adjacent Finchley War Memorial and ensure that the existing community use is reprovided.</p>	<p>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.</p> <p>We strongly object to the proposal for two reasons-</p> <ol style="list-style-type: none"> 1. The current proposal in the SPD would mean the Memorial would lose its current historic and contemporary setting and would have a large

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				<p>and alien new building of up to 12 storeys as its “backdrop”. Such a new building would be insensitive to the Memorial.</p> <p>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 with the object that it should 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.</p> <p>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.</p> <p>The proposal for KOS2 should be changed so that-</p>

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				<p>A. "St Kilda's" is retained and excluded from KOS2 and from any compulsory purchase; and</p> <p>B. any new building constructed to the north of it is of a design so 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.</p> <p>In addition to the above (although perhaps outside the scope of the SPD) , 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".</p>
4.2	29	6.12	This should reprovide office at lower floors potentially including some active ground floor retail/leisure uses, with enhanced residential above.	Paragraphs 6.12 and 6.14 are inconsistent/ lacking clarity as regards residential use. It is unclear whether the policy for the proposed redevelopment requires residential on upper floors, or whether it is merely permissive. This should be resolved.
		6.14	New office development...upper floors can include residential uses	See above.

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4.3	29	6.15	The southern part of the site.. can be appropriate for a landmark building of up to 12 storeys. Building heights should gradually decrease to 4 storeys towards the traditional shopping parades on Ballards Lane	<p>Figure 15, on page 28 identifies a building of up to 8 storeys, not 12. The discrepancy must be eliminated.</p> <p>Building height should also decrease towards the War Memorial so that the new building is not overbearing.</p> <p>Notwithstanding the above, the proposal for a tall building (or buildings) or up to 8 (or 12) storeys on KOS2 is unacceptable. Any tall building would be overbearing by virtue of its height and bulk, out of keeping with the typology of neighbouring buildings and would be likely to introduce unacceptable levels of shading to neighbouring roads and buildings. The proposal for a tall building on KOS2 fails to recognise that this section of Ballards Lane approaching the Arts Depot is narrow – another tall building would introduce an unacceptable sense of enclosure.</p> <p>Buildings on KOS 2 should be no greater than 6 - 7 storeys in height (and that subject to no material adverse effects on neighbouring</p>

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				<p>buldings or the amenity of their occupiers arising), sloping down to 3 storeys in the southern part of the site, so that they are in keeping with the scale of the retained St. Kilda’s part of the site, and (as currently proposed), to the north, gradually decreasing to 4 storeys towards the traditional shopping parades on Ballards Lane</p> <p>As with the proposed tall building on KOS 1, it should be stipulated in relation to KOS2 that any potential wind tunnel effects (and taking into account possible schemes of development for KOS 1) must be eliminated</p>
4.4	29	6.16	<p>The site.. has potential to accommodate development incorporating a more contemporary architectural approach with use of high quality materials, design and roofscape. Building lines should be brought forward to ensure consistency with the neighbouring shopping parades</p>	<p>This is a “gateway” site and potentially a tall building. Accordingly, the required design should be an “example of outstanding and distinctive architecture” and the standard should be “exceptional high quality”- refer to page 18, Objectives Theme 1, paras 4 and 5</p> <p>It should be stated that advancing the building line will only be acceptable if the design is such that any potential wind tunnel effects (and</p>

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				taking into account possible schemes of development for KOS 1) are, as far as possible, eliminated
5		KOS 3 Finchley House		
5.1	32	6.21	The redevelopment of this site ... providing an improved employment offer at lower floors with residential above.	Paragraphs 6.21 and 6.23 are inconsistent/ lacking clarity as regards residential use. It is unclear whether the policy for the proposed redevelopment requires employment use on the first floor or just the ground floor. This should be resolved.
5.1	32	6.23	Ground and potentially first floor are expected to reprovide employment uses with new residential uses above	See above
5.2	32	6.24	Development has potential to rise up to approximately 12 storeys	Greater certainty is required with regard to building height. What does “approximately 12 storeys “ mean? 14, 16, 18? Developers will inevitably seek to maximise the amount of floor space/residential units on the site and yet a key role of the SPD should be to eliminate costly planning delays by providing certainty as to what will be acceptable. Para 6.24 should be amended to read “ to reach up to not more than 9 storeys” This would mean the Council deciding what maximum height is appropriate and

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				<p>specifying this in the SPD- as to which see below.</p> <p>Buildings on KOS 3 should be no greater than 9 storeys in height (as at present, as a “tower” which should be set in a lower podium of not more than 6 storeys), (and that subject to no material adverse effects on neighbouring buldings or the amenity of their occupiers arising), sloping down to 4 storeys in the southern and western parts of the site, so that they are in keeping with the scale of the retained neighbouring houses and flats</p>
5.3	32	6.25	New development should “consider “surrounding roofscapes, active frontages and use of high quality material in order to encourage a more contextual response.	What does “consider” mean in this context? It lacks precision and it is unclear whether it is mandatory or merely advisory. It should be amended. We suggest that the appropriate language is that “New development must be consistent with and complementary to surrounding roofscapes, active frontages, details and proportions and must use high quality building materials throughout its

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				design.” This is a “gateway” site and potentially a tall building. Accordingly, the required design should be an “example of outstanding and distinctive architecture” and the standard should be “exceptional high quality”- refer to page 18, Objectives Theme 1, paras 4 and 5
5.4	32	6.25	Any potential wind tunnel effects should be mitigated through design and orientation	It should be made clear that potential wind tunnel effects must, as far as possible, be eliminated, not merely mitigated.
6		KOS 4 East Wing		
6.1	35	6.33	Development should consider the sensitivity of existing and retained buildings, with height on the High Road matching the height of the retained buildings as a guide. Where floors above this level are added, these need to be set back from the building line. Heights of up to approximately six storeys may be appropriate in the south eastern corner of the site, if similar set back from the retained facades is applied.	What does “consider” mean in this context? It lacks precision and it is unclear whether it is mandatory or merely advisory. It should be amended. We suggest that the appropriate language is that “Development must be consistent with and complementary to existing and retained buildings.....” The concepts of matching the height of the retained buildings on the High Road and yet simultaneously adding floors above this level are inconsistent. The inconsistency should be

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				eliminated so that additional floors will not be permitted, in order to protect local character of this part of the town centre
6.2	35	6.34	“...facades should respond to the local townscape and consider the colour, details and materials used in existing properties.”	What does “respond to” mean in this context? It lacks precision and it is unclear whether it is mandatory or merely advisory. It should be amended. We suggest that the appropriate language is that “facades must be consistent with and complementary to the colour, details and materials...”
7		KOS 5 Friern Park/High Road		
7.1		6.40	The existing car parking should be retained or reprovided subject to a car parking strategy for North Finchley	It should be expressly stated that that any retained or reprovided car park shall be exclusively for public use.
7.2	38	6.42	The redeveloped buildings should match the height of those retained along the High Road, with the potential for upper level residential development to be stepped back...with total building height not exceeding six storeys.	The concepts of matching the height of the retained buildings on the High Road and yet simultaneously adding floors above this level are inconsistent. The inconsistency should be eliminated so that additional floors will not be permitted, where they would be overbearing or otherwise detrimental to local character of this part of the town centre.
			Development should consider the sensitive	What does “consider” mean in this context? It

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			edges on the eastern part of the site, where heights of up to three storeys would be appropriate.	lacks precision and it is unclear whether it is mandatory or merely advisory. It should be amended. We suggest that the appropriate language is that “Development of the sensitive edges on the eastern part of the site should comprise heights of up to no more than three storeys (or less according to the precise context)”.
8		KOS 6 Lodge Lane		
8.1	39	6.48	It is proposed that the existing weekly marketbe relocated to a more prominent location on the High Road, potentially in the new public space near the Tally Ho pub and along the improved Ballards Lane	See comments above at para. 3.6 (relating to SPD para. 6.8) concerning the market. It should be specified that relocation of the market to a new permanent site is to be a precondition to development of KOS 6
8.2	41	6.50	The new development should reprovide as a minimum the number of existing car parking spaces on the site.	Subject to our comments below, it should be expressly stated in the SPD that in any reprovided or retained car park, at a minimum a number of spaces equal to the number of existing car parking spaces on the site shall be exclusively for public use and available at the Council’s usual charging tariff (i.e. not at premium rates). Any spaces for use of occupiers or residents should be new, additional spaces.

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				<p>However, we believe that the opportunity that would be afforded by the redevelopment of Lodge Lane car park as a multi-level car park, as proposed in the SPD, should be used to reprovide a car park which is significantly larger in terms of the number of public parking spaces that it contains.</p> <p>A low-rise multi-level car park, partly constructed below ground level, could provide a significant number of additional car parking spaces whilst still permitting some other development on the site, for example low rise-flats (see para 8.3) . The car park serving “The Spires” shopping centre in Barnet would be a useful starting point in terms of external design and , like that car park, we envisage the structure being surrounded by trees and other planting to screen it and to soften its appearance. See also 10.1 , 11.1 and 11.2 below</p>
8.3	41	6.53	Building heights should be sensitive to existing residential development on and around the site, with new development	It should be stated that the height of buildings throughout the site should not exceed 2- 3 storeys in order to ensure that none of the

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			responding to the surrounding building typology with an indicative height of 2 to 3 storeys, with potentially taller buildings in the north eastern part of the site up to approximately 6 storeys.	existing 2 storey houses along both sides of Lodge Lane (down to the sorting office) is overpowered by new development (and there should be variation between 2 and 3 storeys to avoid creation of a slab-like street scene).
8.4	41	6.54	All development should be of a high quality design..... ...and respond to the character of the nearby listed terraces at 45-53 Lodge Lane. Any new development must consider sensitive views from existing private residential gardens.	Add “ and utilise high quality materials” What do “consider” and “respond” mean in this context? They lack precision and it is unclear whether they are mandatory or merely advisory. They should be amended. We suggest “and must be consistent with and complementary to the character of the nearby properties in Lodge Lane. Any new development must not detract from sensitive views from existing private residential gardens.”
9		Development Principles- Responding to local character		
9.1	42	7.2	Development must consider; existing roofscape, details, proportions and use of high quality building materials in its design	What does “consider” mean in this context? It lacks precision and it is unclear whether it is mandatory or merely advisory. It should be

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				amended. We suggest that the appropriate language is that “Development must be consistent with and complementary to existing roofscapes, details and proportions and must use high quality building materials throughout its design.”
9.2	42	7.3	New development should demonstrate how the townscape can be enhanced with new development of high quality materials, roofscape and design.	What does “demonstrate” mean in this context? It lacks precision and it is unclear whether it is mandatory or merely advisory. It should be amended. We suggest “New development must enhance the townscape and shall utilise high quality materials, roofscape and design”.
9.3	42	7.4	Buildings currently identified to positively contribute to the character of North Finchley should be protected where appropriate, and refurbishment works or changes to units on the High Road should be encouraged where they improve the long term viability of the building.	How are such buildings to be protected? Will a new Conservation Area be created to encompass such buildings to prevent their demolition without approval? The SPD must explain how such buildings will be protected. Perhaps an appropriate Article 4 direction could be made.
10		Development Principles- Transport and movement		
10.1	44	7.5	The town centre’s parking supply is	The proposition that privately operated retail

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			presently working sub-optimally, with the privately operated retail car parks in particular offering spare parking capacity during weekdays and weekends	car parks offer spare capacity waiting to be brought into use is utter rubbish. Shopping trips are not undertaken at a uniform rate throughout the day. Consequently it is to be expected that at some times there will be spare capacity- that capacity arises because, at that particular time, demand is lower. If the car parks were always fully occupied that would indicate a lack of capacity at times of high demand. Further any parking strategy must be structured so that pricing is not so high as to drive away potential customers for the town centre. The principle that car parking charges should be set as low as is consistent with maintaining adequate availability and turnover of users should be expressly recognised in the SPD and in any parking strategy.
10.2	44	7.7	Vehicle dominance leads to perceived and real road severance effects with road crossings being lengthy and sometimes requiring several “hops” from refuge to refuge	It must be recognised that with wide roads accommodating two-way traffic, central refuges may be necessary to permit adequate traffic flows, as otherwise the duration of periods when traffic is halted may be excessive.
10.3	44	7.9	In comparison to other town centres.. North Finchley appears to be offering considerable greater roadspace to traffic..	Arguably, in comparison to other town centres... North Finchley appears to be required to accommodate a greater volume of traffic due to

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			<p>This suggests that some roadspace could be beneficially reallocated to..footway widening...narrower road crossings, street planting, bus waiting facilities and cycle lanes.</p>	<p>the merger of traffic flows from Ballards Lane and the High Road. The draft is deficient in that it contains no objective justification for the principle of re-allocation.</p> <p>In order to re-assure local residents, drivers and other stakeholders, the SPD requires the addition of a policy statement that, as an overriding priority, no roadspace reallocation or other proposal impacting on traffic flows through North Finchley will be put into effect where it would reduce the volume of through traffic the High Road /Ballards Lane are able to accommodate at any time throughout the day, and that any proposals must avoid measures which contribute to “rat-running” on alternative roads.</p> <p>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</p>

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				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.”
10.4	45	7.10	A substantial public realm improvement on Ballards Lane may be achieved by limiting through movement to access traffic, retail and business servicing and buses.	<p>As recognised in the SPD, a detailed technical study is required. The lack of such a study has the consequence that the successful deliverability of the Ballards Lane proposals and of other proposals which may affect traffic flows is a matter of speculation.</p> <p>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. We believe that, for the SPD to be acceptable, it must contain a clear- and short - timetable for the completion of a full traffic study and the subsequent formulation (including public consultation) of a highway plan (including specific and practicable proposals for buses,</p>

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				<p>including replacement of the bus station if necessary). The availability of the highway plan would then assist the formulation of redevelopment proposals for areas within the SPD. In the absence of a workable highway plan the formulation of redevelopment proposals will take place in a policy vacuum as regards highways and will require an unacceptable element of guesswork.</p> <p>The timetable for, and commissioning of, the traffic study and preparation of the highway plan should be led by the Council, not by developers. We suggest that the study, including analysis of the data obtained, should be completed by no later than autumn 2018 and the highway plan finalised by no later than spring 2019. It is important that these things are completed without delay as the adoption of an SPD which is neither credible nor valid due to the lack of a demonstrably deliverable highways plan will exacerbate the “planning blight” that, in the short term at least, will engulf North Finchley town centre if the SPD is adopted.</p>

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				<p>The execution of the traffic study and the formulation of a highways plan must be the first steps of any phasing/delivery plans. The lack of a demonstrably workable highways plan conflicts with the Council’s desire, set out at paragraph 8.7 of the draft SPD (see 14.2 below), that development “ proposals are part of a comprehensive approach in order to avoid piecemeal proposals that are prejudicial to the overall vision”.</p> <p>Even if technical (and of necessity, theoretical) studies indicate that the proposals set out in para. 7.10 of the SPD are potentially achievable, we believe their practical efficacy will be highly questionable. However, in this connection we recognise that there is potentially a significant difference between the consequences of a “simple” re-routing, as shown in Figure 25 of the SPD, if implemented in isolation, and the consequences of such a re-routing if combined with roadspace reallocation as proposed in para. 7.9 of the document.</p> <p>We believe that a priority of any proposals</p>

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				should be to ease traffic congestion, not to increase it.
10.5	45	7.10	The "vision" for Ballards Lane, of "limiting through movement to access traffic, retail and business servicing and buses."	<p>The need for continued servicing of the Arts Depot, the Aldi and for servicing of new buildings (commercial and residential) on the redeveloped KOS1 and also for parking of vehicles used by traders at a relocated market must be adequately accommodated.</p> <p>Consideration should be given to measures to restrict "rat-running" by north bound through traffic seeking to enter Nether Street.</p> <p>Subject to the above, the proposals for Ballards Lane in the SPD arguably constitute an insufficiently ambitious vision. That vision could be enhanced, so that the northern part of Ballards Lane may be more fully pedestrianised, rather than being a "shared street" by-</p> <ol style="list-style-type: none"> 1. excluding buses, which would be re-routed along Kingsway and up the 2-way High Road and 2. having service vehicles and vehicles exiting the Arts Depot car park turn south, into

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				<p>Kingsway, rather than north.</p> <p>The intended traffic study should consider both scenarios and, to anticipate the results of that study, the revised SPD should provide for both contingencies i.e. “shared street” and “pedestrianised street” and also for the contingency of maintaining the status quo in Ballards Lane.</p> <p>A more fully pedestrianised street could be more attractive for users of the proposed open space on KOS1 as it would be less exposed to traffic fumes and noise, although we recognise that there are also arguments against any change in the status quo, whether to shared-street or a fuller pedestrianisation.</p>
10.6	45	7.11	Improving conditions for...cyclists...should be a central focus...Close attention should be paid to providing specific on-road facilities to encourage cycling, as well as cycle parking and route signing.	This is wrong. The central focus of the SPD should be the delivery of the “vision” set out at para 4 of the SPD, which requires that ease of access is maintained for all. Thus whilst the encouragement of cyclists is a valid highways objective it must be balanced with the reasonable needs and expectations of others. Thus, for example, a serious issue arising with

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				<p>cycle lanes is that they "squeeze" buses- and buses are used by the elderly and disabled while cycle lanes are not.</p> <p>Further, 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. We suggest that the behaviour of some cyclists constitutes a danger to pedestrians and that, for example, it would be unwise to encourage cyclists to mingle with pedestrians. The SPD should expressly recognise this.</p> <p>We doubt whether widespread provision of cycle lanes will prove to be practicable.</p>
10.7	45	7.12	Although much of the town centre offers good footway width for pedestrians, the carriageway width is often somewhat out of scale with it making the related traffic activity and road width imposing for those wishing to cross it.	See 10.2 above

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10.8	45	7.17	Moving buses from the bus station at the Arts Depot on to the street....is an important objective.	This is a policy objective. However, no indication is given as to where the on-street bus stands would be placed. Para 7.15 recognises that the presence of buses in the town centre can be negative, with kerbside layovers creating a “bus wall”. 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.
11		Development Principles- Parking		
11.1	46	7.25	The parking survey indicates that the town centre’s parking supply offers scope for better use... Evidence of available supply can be found at the kerbside and especially within the privately owned car parks.	See 10.1 above
11.2	47	7.26	It is important that the town centre provides a convenient and good quality	Lack of readily available car parking is a major issue for both local residents and visitors to the

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			parking supply to maintain a competitive position with other centres	<p>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. See para 11.2 above</p> <p>At our members' meeting to discuss the SPD (see para. 3.1) 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.</p> <p>In relation to parking, the SPD team should urgently consider the implications for parking</p>

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				demand of the proposed expansion of North Finchley Mosque. The SPD makes no mention of the mosque and yet even now, prior to any expansion, those using the mosque at Friday prayer times and major festivals “flood” neighbouring car parks (not just that on the Homebase site- Waitrose as well) to the inconvenience of others wishing to use the car parks for the purpose for which they were intended- as shoppers’ car parks.
11.3	47	7.28	A dedicated development related parking strategy for North Finchley would be beneficial....	The SPD should be clearer on the strategy to be adopted for rebalancing parking provision.
11.4	47	7.30	The principal means of rebalancing parking provision is through amending the parking tariff structure with higher prices for long stay in carparks and simplification of High Road parking to make better use in terms of turnover and stay duration.	Whilst increased turnover and reduced stay duration should be encouraged there are non-tariff issues which must also to be addressed- in particular there are significant payment issues with the current arrangements. Pay-by-phone is a major deterrent for many people, particularly the elderly. More card payment machines are required at kerbside locations. In relation to tariffs and turnover free parking of 30 minute or 1 hour duration should be introduced, in car parks and also for kerbside locations.

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				It is important that the competitive position of the town centre, as a “destination” for shopping, leisure and as business centre is not undermined by parking policies and tariff structures which are out of line with those applying in competing centres. Policies and tariffs should be framed accordingly.
11.5	47	7.31	With the cooperation of the operators of the private car parks there is potential that the longer stay users could fill those available weekday spaces	See 10.1 above
11.6	47	7.32	For future town centre development, the present supply, suitably optimised should be expected to provide for any additional related parking demand given the present parking patterns. Given the high PTAL of the town centre, car free development will be promoted (while still providing for disabled people)	<p>It should be stated in each of the Development Briefs for the KOS whether new residential use is to be “car free” (and how this will be achieved) and, if not “car free”, where the vehicles generated by the residential will be accommodated.</p> <p>If “car free development” is intended to be achieved by denial of residents’ parking permits in neighbouring CPZs there is a substantial risk that this device will merely result in residents’ cars being displaced (parked elsewhere). The SPD should allay concerns on this issue by setting out the evidential basis to demonstrate</p>

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				<p>that displacement of vehicles is not a significant occurrence. Further, the promotion of car free developments discriminates against people who are, for example, plumbers and other tradesmen, who require the use of vehicles.</p> <p>The SPD should explain how parking provision for disabled people will be provided in relation to car free developments.</p>
12		Development Principles- Frontages and shopping parades		
12.1	48	7.36	The Council considers the approach to parade enhancement may take a number of forms including...	<p>The SPD should make clear the requirements that will apply to redevelopment of existing parades and units in them , such as emulating historic examples and traditional building typologies (see para 7.2 on page 42). Otherwise there is something of a lacuna in the drafting of this part of the SPD</p> <p>The street scene can be further enhanced outside shopping hours by the use of security shutters that allow the window displays to be</p>

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				seen whilst still preserving security. The design of many existing shutters sends out a message that the Town Centre "is closed for business" outside shop operating hours and detract from the growing evening economy. This can be addressed by the introduction of an "Article 4 Direction" or other appropriate planning control combined with Design Guidance on shop front security that is specific to the North Finchley Town Centre
12.2	49	7.39 and 7.40	Conversion of upper floors....residential intensification of upper levels...	It should be recognised that there is a conflict between residential and leisure- especially the evening economy- in town centres. Residents will try to curb noise and close music venues down. The SPD should more fully address this issue.
13		Development Principles- Public Realm Strategy		
13.1	50	7.44	Key issues...include...lack of pedestrian priority areas with seating to encourage visitors to stay and spend time.	Whilst seating outside cafes and the like is to be welcomed, "uncurated" seating which may encourage "undesirables" should be designed so as to discourage more than short stays.
13.2	51	7.50	Improvements... incorporating raised tables	Raised tables should not be included as they

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			at key locations to improve pedestrian priority and slow vehicles	give rise to increased exhaust fumes, potentially cause damage to vehicles, and injury to those suffering from brittle bone disease. Additionally, these particular proposals are inappropriate in the context of a shared street as is proposed for Ballards Lane.
13.3	54	7.54	Wayfinding signage will be included to enhance pedestrian legibility.	What is “pedestrian legibility”? This, and other, jargon should be replaced with plain English.
13.4	55	7.59	A legible street furniture palette will be used that ensures continuity between different character areas	What is a “legible street furniture palette”? Again, to be replaced with plain English
14		Delivery & Implementation		
14.1	56	8.4	<p>A coordinated and comprehensive approach will ensure:</p> <ul style="list-style-type: none"> - the appropriate quantum and mix of development will be delivered - development is phased in an appropriate manner and timescale - required social and physical infrastructure to support development is in place at the required time - improvements to the public realm throughout the SPD area are made 	<p>The SPD fails to specify sites for new infrastructure provision. Such sites should be specifically identified. Further, the SPD should set out the policies that will be followed with regard to funding, including how CIL and s.106 receipts generated from the SPD area will be applied. Such receipts should ideally be ring-fenced for use within the SPD and its immediate locality.</p> <p>A “coordinated and comprehensive approach”</p>

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			<ul style="list-style-type: none"> - the town's car parking management strategy meets local needs - there is a coordinated approach to funding infrastructure needs 	<p>will include the implementation of 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)- see para 7.19. The draft SPD is silent as to what these measures might be. This is unsatisfactory- it suggests the issue has not been addressed.</p> <p>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. For example, it might be necessary for the phasing strategy to require that the buildings on another large KOS are cleared, and that KOS used as a temporary public car park, on the Council's usual tariff, whilst KOS6 is redeveloped.</p>
14.2	56	8.7	Whist the Council recognises that development itself may come forward in a phased manner, it will require that	This requirement is likely (and perhaps deliberately) to operate unfairly between different parties as only a party which secures

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			proposals are part of a comprehensive approach in order to avoid piecemeal proposals that are prejudicial to the overall vision.	control of key sites will be able to provide a “comprehensive approach” This section of the SPD should be amended to read “The Council recognises that development itself may come forward in a piecemeal manner, and will require that such proposals are not prejudicial to the overall vision.”
14.3	56	8.8	Where proposals are for significant developments in the SPD area, the Council will wish to see these brought forward accompanied by an overall masterplan...	Is “will wish” a policy or an aspiration? Again, this requirement is likely (and, again, perhaps deliberately) to operate unfairly between different parties as only a party which secures control of key sites will be able to provide an “overall masterplan”. This section of the SPD should be amended to read “Where proposals are for significant developments in the SPD area, these should demonstrate that they are part of and/or contribute to the comprehensive regeneration approach embodied in this SPD”
14.4	57	8.18	The Council will also work with partners to support businesses to relocate where required...	Further detail is required as this will be a major concern for businesses affected by redevelopment proposals. This is especially important as there are many small businesses

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				based in the SPD area and such businesses are likely to be disproportionately affected, when compared with the impact on, for example, a national retailer
14.5	57	8.23	A specific phasing strategy is not set out in the SPD as the Council recognises market trends and viability will influence the ordering of proposals	<p>Unfortunately, the nature of the SPD proposals requires that at least an element of phasing should be set out in the SPD as mandatory requirements. Thus policy statements should provide that :</p> <ul style="list-style-type: none"> - 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 - if the market is to be relocated to the proposed new public space at the Tally Ho triangle/ Arts Depot site (KOS 1), then KOS 1 must be redeveloped before Lodge Lane (KOS 6) - because of the importance of the proposed new public space that is

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				<p>suggested should be included within the Tally Ho triangle/ Arts Depot site (KOS 1) and the need to retain servicing arrangements for Aldi and the Arts Depot, and access to and from the Arts Depot car park, and suitable arrangements for traders' vehicles to serve a relocated market ,before redevelopment of KOS1 a workable traffic scheme encompassing the Ballards Lane proposals of the SPD must be fully developed and any preconditions satisfied</p> <ul style="list-style-type: none"> - before change of use of the bus station will be permitted, satisfactory permanent new arrangements for buses must be put into effect. Additionally, it should be recognised that servicing arrangements for Aldi and the Arts Depot, and access to and from the Arts Depot car park must be retained - in the absence of other suitable and deliverable proposals, a requirement that the buildings on another large KOS are cleared, and that KOS used as a temporary public car park, on the

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				council's usual tariff, whilst KOS6 is redeveloped.
14.6	57	8.26	The SPD requires the provision of a range of physical, social and environmental infrastructure. This includes ... community use as part of mixed use development including where appropriate education and health provision	See 1 above. "where appropriate" is inadequate. The revisions to the SPD should identify a specific location for a new health centre.
15		Other issues		
15.1		Trade and business disruption		How will existing local traders and businesses be protected during redevelopment and what will they be offered in terms of new premises where their current premises are to be redeveloped? How will this be "guaranteed"? The SPD should establish a clear source of funding for, and a budget in respect of, compensation (and which should not be limited to statutory compensation for "statutory blight") for traders and businesses blighted by the SPD and development proposals.
15.2		Homelessness		Some existing residents would lose their homes, as they would be redeveloped. What would happen to these people?

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				<p>Barbara Langstone House, located on KOS2, used to be a Barnet hostel for the vulnerable. It no longer is. It is regrettable that the SPD seems to include nothing specifically directed at helping the homeless, and other more unfortunate members of the community.</p>
15.3		Business space		<p>The redevelopment proposals would result in the loss of much of the current stock of office accommodation in North Finchley.</p> <p>Where will the businesses concerned relocate to, given that many of the buildings in the area which used to be offices have been converted to residential and there is no guarantee that new business accommodation created by the redevelopment will be sufficient to relocate all businesses affected, or that the accommodation will be affordable for them?</p> <p>What is the Council's assessment of future demand for offices and other non-retail employment uses in North Finchley? The SPD policies should be informed by such an assessment.</p>

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				<p>The SPD should be amended so that appropriate minimum office /non- retail business floor space requirements on redevelopment are specified for each KOS to ensure that sufficient replacement space is created. The SPD should consider and justify its position on this re-provision if the replacement space is to be less than the space that will be lost across the KOS's if all the proposals for demolition were implemented.</p> <p>Office and other non-retail/leisure employment in the town centre is an important source of daytime demand for retail and other town centre traders and a reduction in such employment and the replacement of offices and business space with residential use risks reducing such demand (many new residents will work in other areas, not in North Finchley)- this, of course, conflicts with the SPD's vision of a "vibrant town centre" and of protecting and enhancing the primary shopping area (Objectives, Theme 2). Thus it is important that the overall level of office and other non-</p>

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				retail/leisure employment in the town centre is maintained, and, ideally, increased.
15.4		A sense of place		The Local Plan Policy CS5, concerning creating high quality places, provides that all development should “contribute to people’s sense of place...”. The SPD should plan to put this into effect by including measures for the provision of enhanced heritage signage throughout the SPD area.
15.5		Southern High Road Site		The site comprising Homebase and the Finchley Mosque forms part of the SPD area and yet the SPD contains no proposals for it. The site lies outside the designated town centre but within the SPD boundary. See Spatial Strategy paras 5.9 and 5.10. It is strange that “no specific sites are identified in these areas” (5.10). By failing to include a discussion of future possibilities for this site in the SPD the Council has, in effect excluded it, and the development principles that might apply to it, from public consultation.
15.6	10	Local Plan Core Strategy (2012) 2.15	“..target of 40% affordable homes (on sites of more than 10 dwellings)”	We believe this paragraph incorrectly reflects the provisions of Policy CS4- the affordable homes requirement applies to “sites capable of accommodating ten or more dwellings”.

