The Planning Committee of the Finchley Society has prepared the following report on the application 25/0213/FUL Reprovision of Finchley Leisure centre, 1502 new homes class C3, 2590 sqm retail/commercial floorspace class E .

1.1 The assessment has been deliberately carried out in a structured way based on the criteria set in the Place Alliance 'A Housing Design Audit for England' 2020 used in research of existing new housing which led to the conclusion that most is overwhelmingly poor. It is further informed by research carried out by LSE for the GLA entitled: Living in a denser London: How residents see their homes.
The new local plan adopted in 2025 should be seen as the yardstick for compliance. It was 8 years in the making, with considerable community input and should carry great weight. We see no valid reason for deviating from this to the extent that this proposal does.

1.2 The use of a design-based approach rather than the traditional density calculation requires that all aspects of good design are met to determine the number of homes and other uses that the site can accommodate . This is to ensure good place making and benefits to the greater community and providing good quality environment and homes to live for decades to come. The Inspector at the Homebase Inquiry (very close to this site) found that the understanding of amenity in respect of Planning extended to the design and living conditions and therefore the lived experience of the future residents and determined that harm to future residents carried significantly more weight than the need for numbers. (APP/N5090/W/22/3304952)
The Chief Planner has informed the Finchley Society that the Borough's housing targets would be met from the projected figures shown on sites in the Local Plan. Therefore, there can be no justification of need for inflating the figure for this site to such an extent.

1.3 The conclusion of our report is that this is a grossly over dense housing scheme which maximises the number of dwellings at the expense of safe and healthy homes. The homes are too tall and much too close together leading to poor living conditions and is in contravention of the new Local Plan, the London Plan and the NPPF. The provision of a new leisure centre is welcomed but this number of additional potential users on site is likely to overwhelm the facility to the detriment of the rest of the Borough users.
The proposal is fundamentally, and in several separate material respects, in contravention of the development plan and must be refused. Approval of this would leave the decision vulnerable to judicial review.

2.0 ENVIRONMENT AND COMMUNITY
Community facilities – Does the development provide (or is it close to) community facilities, such as a school, parks, play areas, shops, pubs or cafés?

2.1 NO
We do not agree with the timings on p12 of the D&A
The site is positioned between but more than a km away from the local centres of East, Central and North Finchley, and is certainly not within a 15-minute walking distance for the majority. There are no libraries, playgrounds, shops, pubs or cafes in the immediate area and the question remains unanswered as to whether the social infrastructure such as doctors, schools can cope with the addition of 1502 households. Ironically there is well used leisure provision currently on the site which will be removed with the redevelopment. The Leisure Centre will be re-provided but the bowls and cinema will not and they currently provide affordable entertainment for families and in particular teenagers, of all abilities.
NPPF Dec 2024 129 C) requires the availability and capacity of infrastructure and services. E) well designed, attractive and healthy places. This requirement is not met and the density too great to allow for healthy living.

2.2 The Council should have assessed the additional demand for school places, access to GP's and other services as a consequence of this development and have demonstrated how this will be coped with. There is nothing shown.

2.3 The proposals show the inclusion of some 'shops, cafes.' but there is no control about what these might become. These might be used to house more than just shops, perhaps a walk-in medical facility and a multi-use space for community use and cultural activities.

2.4 There is green open space adjacent, but concerns raised that the possible additional numbers of people will disturb and cause harm to the nature reserve. No proposals shown as to how to mitigate that nor any proposals to upgrade the facilities on the Glebelands open space. It is noted that at Brent Cross Town there is to be substantial upgrading of the open space opposite as part of the overall development. Why is this not happening here?

2.5 A Leisure Centre is proposed to replace the current Centre and this is to serve the current users and residents from across Barnet and bbeyond. It is unclear whether the facility has been sized to cater for the potential of more than 4000 additional users right on the doorstep.

2.6 It has to be questioned whether in fact a scheme could have been produced which significantly refurbished the existing leisure centre, and retained the popular bowls and cinema facility which do provide much needed leisure facilities that are not being replicated elsewhere. The developer for both this and Lodge Lane Car Park, North Finchley is clear that the provision at Lodge Lane is not intended to be a replacement, but a much smaller and more exclusive provision is anticipated, but not assured.

3.0 ***Housing types – Is there a mix of housing types to meet varied local needs?***

3.1 NO. Policy HOU02 table 7 sets out the requirements which are not being met.
Of the 1502 homes currently proposed, only 18% are described as family homes of 3 and 4 bedrooms. The reality for many is that 2 bedrooms are also acting as family homes.
The Local Plan identifies a need of 65% for 3 and 4 bedroom for market housing and 40% for affordable housing. The 18% therefore indicated is far too low. The preferred housing mix as set out in the Plan should be applied. The Local Plan shows a particular need for 2, 3, 4 and 5 bedroom dwellings set across all tenures. The final mix of homes will determine the number of people, adults and children, who are living there and in turn therefore the amount of play space and supporting infrastructure that will need to be provided.

3.2 The housing comprises solely flats in high rise dwelling with no houses with their own gardens. The LSE study shows that high rise is not popular with families and households without children would move on if wishing to start a family or not even move there at all. Therefore, this is the wrong sort of development to attract a mixed and stable community or to provide for the Boroughs needs. This is not a city centre site, but a suburban site and there is a pressing need for family housing with private gardens.

3.3 Why is there no specialist need housing – for example sheltered, co housing? A site of this size could support such development. Policy HOU01 sets a strategic target of 50% affordable housing and requires an appropriate housing mix. The summary schedules show 13% affordable plus 9% shared ownership which is a mere 22%, failing to meet the Policy requirements. The inclusion of social housing in addition to provide for those who cannot afford even the London Living rent should be a requirement on a scheme of this size.

3.4 The opportunity has not been taken to create a multi-generational community who wish to stay and mix with the greater community around. A development that produces homes that are bought for investment only then either left empty or rented out on short term lets at the highest return would be a failure. It should be a condition that flat owners should not be allowed to sublet.

4.0 **Quality of housing design – is it fit for purpose?**
Housing design standards

4.1 Both the London and Local Plan set out criteria needed for good housing and these are not being met. Local Plan CDH01 Promoting High Quality design: 6.9 Internal layout and design in accordance with London Plan 3.6.5 single aspect dwellings should be avoided. Good ventilation, privacy, daylight and orientation
The choice of housing form with the central corridor with flats off each side does not give good housing. The London Plan asks that developments avoid long narrow corridors, yet here are narrow, long, artificially lit and ventilated corridors leading to the front door of each home. The corridors are too narrow to allow families or groups to pass comfortably and safely. No room to meet and chat and no possibility of using as amenity space. This is more like a hotel than a home.

4.2 Space standards in all homes need to accommodate change in circumstances through life, thus supporting the stability of the community. Living in these dense urban situations is only tolerable if space standards are good, and amenity spaces for each home are usable and enjoyable. P92 Table 8 of Barnet plan gives MINIMUM residential space standards and requires better than that. The Study: Living in a denser London showed that lack of space and storage are key problems and flats were generally found to be too small.

4.3 GLA findings on living in tall buildings such as these is that families do not like living high for various reasons. The conclusion is therefore that to comply with the Borough requirements for families, these units would have to be low down the blocks. However units in the lower floors are dark and not designed to give the space needed for family life. In fact no one should be expected to live in dark homes.

4.4 Most of the flats show combined living, dining and cooking space which does not give flexibility of use of space. Where is homework done, tv watched, working from home carried out if all these might need to happen at the same time as a family might expect to do?

4.5 The Daylight and sunlight analysis summarises the development as having 73.3% of rooms across the whole development as achieving minimum levels of daylight autonomy, meaning that 26.7% do not achieve Minimum daylight standards. The detailed analysis floor by floor of the blocks shows, not unsurprisingly that the lower floors are badly affected, therefore the excessive heights and closeness of the blocks is depriving residents of daylight, sunlight both essential for physical and mental health. In addition many residents will be looking out onto dark facades and open spaces below for most of the year.

4.6 P 191 of D&A The stated level of 67% dual aspect means 448 or 33% are single aspect dwellings which is unacceptable in the context of 'should be avoided'. Of these 46 or 3% are north facing which is not allowed. If the GLA definition of dual aspect were applied, then we suspect that even more homes would in fact be classed as single aspect.

4.7 Homes in blocks A and B face onto the busy A1000. Their private amenity space, balconies facing the road, will be unusable.

4.8 Homes in blocks A,B C and D which face each other are mostly 18m apart, with their balconies projecting. This affords no privacy from those facing them and they will be shaded or looking out onto shaded facades. The homes overlooking the courtyards of blocks A, B C and D are similarly affected. All of these contravene Barnet's Residential Design Guidance SPD (2016) (still relevant) which require a minimum of 21m between facing windows. Section 7 of the document states at Table 1.2 that: 'outdoor amenity space which does not have a reasonable level of privacy will not be considered to be usable.' This applies to all the balconies that are directly visible from buildings directly opposite, and to the tiny pieces of land counted as private amenity space outside ground floor properties adjacent to public streets and walkways.
This is not a city centre site and therefore there is no justification in the lowering of daylight and sunlight and separation distances from the BRE and Plan standards. These are set as minimum standards and should in fact be improved across all dwellings.

5 ***Public transport - Does the development have easy access to public transport?***
The transport system tube and bus

5.1 NO
Site 58 in the Local Plan gives PTAL1B in 2019 rising to 2 in 2031.

5.2 The LSE research for the GLA p60 showed that transport was by far the major factor when choosing a home. So with a poor public transport system this location is not going to be popular.

5.3 This development is on a cul-de-sac site that is not within the required distance to give easy access to the tube or rail system. There are only 3 buses that directly serve the site and the 263 that will take residents to East Finchley Station is already heavily used. The assumption of very limited car ownership and providing restricted levels of parking will encourage active travel and use of the transport system seems to be the intention. However for this to work there will need to be a big shift in focus from the current norm in the suburbs which will not happen if there is insufficient transport to support the additional number of people, which could be as high as 4863 if all bedspaces are filled.

5.4 The Local Plan recognises that a good public transport infrastructure is essential to sustainable growth yet policy GSS01 does not include the A1000 in the list of new public transport infrastructure.

5.5 The proposal is for 1502 homes, 5599 habitable rooms on 4.9HA which gives a density of 305 dwellings per HA or 1143hr/HA. This ignores the fact that some of the site has commercial units also and the site area also includes the Leisure Centre and its approach from Summers Lane. In our view this is inappropriate. The area of site used for housing as identified on site 58 in the Local Plan is 3.45HA therefore in fact the correct density for the housing is even more extreme at 435 dwellings/Ha

5.6 The Density matrix p 253 of the Local Plan gives an indication of what density can be achieved with that PTAL in 3 settings. A suburban site with average 3.1 – 3.7 hr/unit should be 50 – 95 u/ha. The Inspector at Homebase identified this area as suburban. Therefore in this instance the calculation taking the highest level of 95 u/ha would give 327 units. The Local Plan gives a minimum of 352 dwellings.
If assumed Urban then 70 – 170 u/ha, or even central 100 – 240u/ha. So this proposal exceeds a suburban location by more than 4 times the maximum, and even the density of a central London location with this low PTAL rating by almost twice. So whichever way you look at this it is a hyper dense housing scheme totally unsuitable for this area. This density has been achieved by building tall, much taller than anything else in the immediate area and with blocks too close together to achieve acceptable living standards. It is totally out of character.

5.7 The aim to reduce car use and dependency is more challenging in these suburban areas. There has to be good public transport with capacity both on the Underground and the local bus network so that demand is closely and efficiently matched. There is very real concern that the current capacity of the Northern Line will not be able to cope and anecdotally it is already impossible to travel safely and comfortably at peak times, even after Covid. This applies equally to the buses. This site is not a suitable location for a development of this magnitude. This development would require a degree of improvement in public transport that is not conceivable, and it must therefore be refused.

5.8 Pedestrian access to bus and tube will need serious public realm improvements but none are guaranteed let alone indicated. We would urge the Planners and Councillors to stand at the bus stop outside and across the road, in the rain, and travel on the 263 to East Finchley during working hours, and again at night in the dark. The whole experience is not good, extremely difficult if you have any physical impairment, children, buggies or heavy shopping, and needs to be greatly improved.

5.9 The GLA study revealed that access to good transport was by far the most common reason for choosing a home in a high rise development. Therefore the implication is that this will not be a popular location for high rise living.

6.0 ***Environmental impact - Does the development have a low environmental impact?***

6.1 The stated aim for this development of meeting the highest environmental standards does not seem to be backed up with how this will be achieved other than a fabric first approach (i.e.. Well insulated against both heat loss and heat gain) with use of air source heat pumps for heating. This must be zero carbon development, which is the aim for London by 2050, and should be an exemplar of how this can be done. We were surprised to see no reference to SUDS (sustainable urban drainage systems), rainwater harvesting, green roofs, solar collection, use of green materials which we would expect to see. If not achieving net zero then the applicant is required to show how the buildings will be adapted once it is a requirement. The cost of that should not have to be born by the occupiers.

6.2 Building tall is not in itself sustainable. Every building needs a lift, which uses energy, expensive to maintain and replace. The density of building is such that many of the homes will not receive good daylight and sunlight thus necessitating additional use of electric light. The single aspect of many of the homes will require mechanical ventilation which should be unnecessary.
The UCL Energy Institute research shows that high rise buildings are much more energy intensive than low rise. The higher the building the cooler the air and higher the wind speed resulting in a higher energy demand. The area of roof per dwelling available for solar panels is severely reduced.

6.3 The daylight study shows that the built form will cast shade in many areas for most of the year. Achieving a 2 hour slot is really not good enough nor healthy. We could not find a wind study – for a high rise like this it is essential to find the impact at ground level for sitting, playing etc, and for residents sitting our on their tiny balconies – will they actually be able to use them.

PLACE CHARACTER

7.0 ***The locality – Is the design specific to the scheme?***
Character of the development - Does the scheme feel like a place with a distinctive character? Does the new fit into the character of the existing?

7.1 Policy CDH01 C. a asks that the scheme 'Respond sensitively to the distinctive local character and design, building form, patterns of development, scale, massing, roof form and height of the existing context'.
Clearly the proposed does not meet this Policy requirement. The scale, form and typology is like nothing else in the area, and certainly not in the immediate area. The Inspector at Homebase was clear, this part of Finchley is a suburban location therefore this proposal is non compliant with CDH01

7.2 The D&A description of Great North Avenue leading to the Leisure Centre cites the potential for 'shops, cafes, and public spaces' and intimates that this be a space to sit out and meet friends before going to the Leisure Centre. Unfortunately, the blocks face north and present a wall of building of such a height that it will be permanently in shade. In particular the 81m tall block E will literally tower over the Leisure centre and the play space, causing shade and wind. The entrance to the centre itself is considerably higher and requires steps or a ramp to access. The urban design is poor. Currently the Leisure centre is well used by residents who are less able and require good accessibility. We do wonder if the Borough has properly assessed the needs of the current users as this design makes the centre considerably less accessible.

7.3 The Local Plan is clear that this site is not suitable for tall buildings defined as over 8 stories or 26m. In fact the Inspectors when reviewing the draft Local Plan went so far as to remove this site from the locations that could be suitable. So clearly this development is in contravention of policy Barnet Policy CDH04: Tall Buildings Paragraph 6.17.11 sets out the reasons against tall buildings and states that it is '**essential** that proposals occur in suitable locations as outlined in CDH04.
It does stand on the A1000 which is identified as suitable for intensification BUT that does not mean building tall and contrary to policy. It is equally possible to intensify the area at 6 stories and below and include some houses. Currently there are no dwellings on the site so the indicated minimum of 352 in the local plan would be a significant intensification.

7.4 As this site is not suitable for tall buildings therefore it is a nonsense to even assess the impact on the area. There is suggestion in the D&A that the proposal for the High Road is knitting back together a High street which is self evidently nonsense. The visual impact is unacceptable.
Functional impact – servicing, maintenance and building management are not fully addressed. The cost of maintenance should be spelt out for future years and the impact on service charges spelt out. Rubbish storage and collection, deliveries to households (white vans etc), maintaining the green spaces, repair and maintenance of buildings, especially tall which will imply high service charges esp. in future when tall buildings need repair.

8 ***Existing and new landscape – Does the scheme exploit existing landscape or topography and create a new bio-diverse landscape?***

8.1 Yes and no. The fall across the site has been used to introduce car parking under podiums with the result that the 'streets' are faced with the podium walls and the shared use walkway is traversed by cars. See comments above about access to the Leisure centre.

8.2 The extreme density precludes a successful biodiverse landscape. The site itself is on a slope leading down to a river. Much of the ground has building dug into it which can have serious impact on the hydrology with implications for local flooding.

9 ***Street legibility - Do the buildings and layout make it easy to find your way around?***
Street definition - Are streets defined by a well-structured building layout?

9.1 We are not convinced that the streets will be safe as required by Policy CDH01 and CDH03.The sheer numbers of pedestrians and vehicles using these shared streets imply that they are too restricted. The lack of definition of uses will lead to confusion.

9.2 For example on the eastern route 5 front doors to blocks E and F serve 563 homes. There are entrances also to blocks C and D plus access to the bin collection store. There will be many delivery vans serving many hundreds of buildings looking for the dwellings they are delivering too. The layout is confusing.

STREETS, PARKING AND PEDESTRIAN EXPERIENCE

10 ***Highway design - Does the building layout take priority over the road, so that highways do not dominate?***
Car parking - Is the car parking well integrated and situated, so it supports the street scene?

10.1 The housing certainly dominates the road to the extent that it is hard to see how the roads and lanes will cope with all the traffic there will be in reality. Therefore, it is quite likely that the sheer number of delivery vans will drive and park wherever they can, which will mean on the planted and play areas. Residents and their visitors will similarly park where they can. The proposal is unrealistic particularly in the context of the very low PTAL.

10.2 Local Plan TRC03 **requires** parking levels as table 20. For a PTAL of 2, which is the greater of the 2 levels for this site, 0.75 spaces for 1 and 2 bed units, and 1 for 3 bed and up. That gives a total requirement of 1191 parking spaces, 4.4 times the amount being provided.
Clearly the site cannot accommodate that, but to deviate by such a high degree indicates that there is too much development for the site to accommodate. See section 5 also.

10.3 Provision for the delivery vans, of which there will be many, taxis, visitor drop off, and how these are satisfactorily accommodated near each housing entrance, without destroying the pedestrian environment, needs to be demonstrated. We do not believe this is possible given all the factors stated.

Pedestrian friendly - Are the streets pedestrian and cycle friendly?

11 ***Connectivity within and with the surroundings developments - Does the street layout connect up internally and integrate with existing streets, paths and surrounding development?***

11.1 This site is a cul-de-sac off the main A1000 road which is an extremely busy road. So, there is no opportunity for the proposed to be integrated into the surroundings. The access to the Leisure centre is from Summers Lane which is unlikely to be able to cope with the traffic generated. The path leading to Glebelands is narrow and currently unsafe to walk down at night and requires improvement to make it safe and useable. With the introduction of units opening off this path it is surprising that there is no proposal to upgrade this important link.

11.2 Within the development itself the main street leading to the Leisure Centre has tall blocks to the south incorporating north facing units, that will shade the street and make it unpleasant to sit in outside the proposed cafes. The pedestrian access to the Leisure centre itself is raised up above the roadway, where visitors arriving by minibus or taxi are dropped off, and is access by steps or a long ramp. This does not help the Leisure centre integrate into the pedestrian environment.

11.3 The internal streets are narrow and multiuse Given the situation in section 9 the pedestrian experience is likely to be pretty uncomfortable as there will always be the possibility of a frustrated driver driving dangerously.

11.4 A study of air flow /wind conditions should be carried out on the environment around tall blocks. An air quality monitoring station should be provided

12 ***Safety and security - Are open spaces, play areas and streets overlooked and do they feel safe?***

12.1 All the functions are rolled together in order to appear to meet the required play space. So play is mixed with pedestrian and car and delivery vehicle use, so the answer to safe play is NO, not at street level. Residents with children who live in tall buildings are reluctant to let their children go down to play on their own as they cannot see them. Consequently the survey of residents in tall buildings found that families do not tend to occupy the flats. Their preference was to move out to a lower flat or house development if intending to have children. Thus under occupation is the trend which of course is only available to the more affluent, or to investors looking merely to gain income by renting out., and a transient population, not leading to a stable community. The play areas are not overlooked in a meaningful way. The lower flats that might have been popular with families will be dark and unattractive.

12.2 Secure by design
The Police report has not been published. Anecdotally a police officer who patrols locally has expressed real concerns about the design. Walking through the ‘streets’ at night – what will that be like?

12.3 There is a lack of clarity between public and private space, thus the concept of defensible space is lacking for the ground floor units. A street with front doors gives a greater feeling of safety when walking through at night, but here at ground level there are very few doors or windows with people behind, especially over on the eastern road serving blocks E and F.
The archway through from the High Road will likely be a meeting place and is not overlooked. Ideal for crime.

12.4 What happens at street level, in particular entry to blocks, will be key to making the area feel safe and secure. Streets and open spaces and parks should feel overlooked. For large blocks with a single point of entry a concierge system will help to make the entrance secure and additionally provide a place where packages delivered during the day can be dropped off. Are there any? See also section 9

DETAILED DESIGN AND MANAGEMENT

13 ***Public, open and play spaces – Is public, open and play spaces well designed and does it have suitable management arrangements in place?***

13.1 NO
Play spaces must be overlooked, appropriately sized for the numbers of children anticipated and located appropriately for each of the blocks of housing. Areas of green space, street trees, landscaped areas are all essential. It is not at all clear that the requirements for safe play are being provided nor sufficient space. How these are maintained and managed need to be clear at application stage. whether this is public provision or private space needs to be clarified and an undertaking that these green areas are delivered and not scaled back as 'non material amendments' as happens so often with the green infrastructure.

14 ***Architectural quality - Do the buildings exhibit architectural quality?***

14.1 The overall feel of the place will be overwhelmingly dense and claustrophobic. CGI's demonstrate that. The feeling for the person at ground level will be a uniformly overbearing, with little relief. With the blocks so close together from the High Road and Glebelands the appearance will be monolithic with the blocks all so close together and in many cases in fact joined together along a footpath or shared road way so no visible sky to break up the monotony. The elevation to the High Road forms a solid bank of brickwork with a single arched entrance, rather like a medieval fortress.
The use of attached balconies rather than inset give a sense of unease for both the users and the passer by below.

15 ***Storage and bins - Are storage spaces well designed and do they integrate well within the development***

15.1 It is difficult to see how this will work in practice. Residents have to travel down, maybe 26 storeys, with their rubbish and place in a bin in the base of their block. For some this will require walking through the car park to find a bin. How are bins for Glebelands walk managed?
On bin day all bins have to be moved to the collection point by block C, the only place the bin lorry can access. Who will do this and who will put the bins away after?
Any comment from the Refuse department has not been published

16 Final Comment
The sheer scale of this application will mean that we do not have time to list all the policies ignored nor for detailed analysis of all the issues feeding into the resultant unhealthy housing being proposed. It is a huge disappointment that after all the meetings and talk the applicant has chosen to produce a scheme that is so extremely out of alignment with the Local Plan and the wishes of the local community. The form of the proposed development requires complete redesign and therefore for all the reasons stated should be refused.

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