



LBB DRAFT LOCAL PLAN 2020

Response of the Barnet Society

15 March 2020

INTRODUCTION

The Barnet Society is a non-political organisation with some 600 members that seeks to influence local and central government on aspects of planning and the environment in and around the parliamentary constituency of Chipping Barnet.

2.1 Barnet's Character

2.1.2 As a Society founded in 1945 to protect Barnet's green spaces, we strongly support the Council's wish to use the Borough's open spaces to improve the health and wellbeing of its residents and attract visitors to the area. But to 'maximise' usage without proper care for its impact risks damaging our green and blue assets; the Council should 'optimise' usage (i.e. 'get the best out of', to quote the Vision, 3.1.1.).

2.1.4 We agree that sustainable growth is key, but it should be supported by commitment to the highest environmental standards reasonably attainable. By 2036, the end date of this Strategy, it will probably be too late to mitigate catastrophic climate change. That challenge must be at the forefront of the Council's planning now.

2.2 Housing

We support the views submitted by the Federation of Residents' Associations of the London Borough of Barnet (FORAB).

2.3 Economy and Town Centres

2.3.1 & 2 We welcome Council commitment to our town centres, and to sufficient provision of affordable and flexible workspace, particularly in town centres.

2.4 Environment & 2.5 Health and Wellbeing

We agree with these sections, but would like to see their interconnection acknowledged.

2.6 Transport

2.6.4 We agree with Council support for active travel and public transport opportunities, as well as promoting innovative ways to enable long term modal shift, and would like overt commitment to cycling (human and electric-powered).

3.1 Vision

Policy BSS01 (Spatial Strategy for Barnet), a) i

We agree with FORAB that the target of 46,000 new homes is unrealistically ambitious.

Policy BSS01 (Spatial Strategy for Barnet), a) vi

We have no objection in principle to a destination hub for sport and recreation at Barnet and King George V Playing Fields. However we strongly object to the Council's current proposal for a substantial development in the middle of the Green Belt. (We comment further below at 4.24.3).

4.3 Barnet's Growth Requirements – Housing

4.3.6 We agree with FORAB that the target of 46,000 new homes is unrealistically ambitious.

4.5 Parks and Recreation

4.5.2 See comment on 4.24.3 below.

4.7 Delivering Sustainable Growth

4.7.5, Table 5 & Figure 3 We share FORAB's confusion over the housing figures. In addition, the red line indicates a London Plan annual target of only some 2,300 (whereas Table 4 states 3,134).

4.19 Barnet's District Town Centres

4.19.5 We agree with this paragraph and its associated Policy GSS08, but must point out that Chipping Barnet is economically weaker than others in and adjacent to the borough because it has to compete with Potters Bar, Hatfield, London Colney and Borehamwood, which are easy to reach by car.

Conversely, Hertfordshire commuters to London are drawn to High Barnet and New Barnet Stations because over recent decades bus services in Hertfordshire have atrophied or disappeared altogether, creating extra demand for car use and parking at and around those stations. This should be recognised in the Local Plan.

4.20 Existing and Major New Public Transport Infrastructure

4.20.1-6 Crossrail 2 is a very long way off. Shorter-term is the probability that the existing Great Northern local service between Moorgate and Welwyn Garden City will be taken over by TfL's Overground network. This suggests that the Oyster facility will be extended to stations beyond Hadley Wood. Given line capacity restrictions between Finsbury Park and Moorgate, any increase in local services through Oakleigh Park, New Barnet, etc. would be best achieved by extending Crossrail 2 journeys north of New Southgate. In turn, this would help boost New Barnet as a retail, employment and residential hub.

4.21 Estate Renewal and Infill

4.21.1-4 Redevelopment of estates needs to facilitate bus access. Through bus routes should be created where possible (with adequate road width) and cul-de-sacs minimised. If necessary, bus stops should be added to keep residents within 400m of a stop.

4.22 Major Thoroughfares

4.22.2 An important aspect of denser development is ensuring that bus flow and bus-stop location is given early attention. Bus lanes can be valuable in congested areas, but there is only limited scope for them in Chipping Barnet. Of greater benefit would be more attention to, and enforcement of, waiting restrictions on one or both sides of bus routes.

4.23 Car Parks

4.23.1 This paragraph and its related Policy GSS12 should recognise the extra demand for car parking at stations close to Hertfordshire (see 4.19.5 above). Wholesale removal of parking at High Barnet and New Barnet Stations would be counter-productive, displacing cars onto local streets and discouraging car-sharing and other integrated transport solutions.

4.24 Strategic Parks and Recreation

4.24.3 The proposed sport and recreation hub at Barnet Playing Fields comprises a building as big as a small primary school plus a floodlit outdoor games area and parking for 65 cars, right in the middle of playing fields. This would be a flagrant breach of the openness of the Green Belt – and quite unnecessary since other, far less conspicuous (and probably cheaper and more convenient) sites exist close by.

5.0 Housing

We support the views submitted by FORAB.

[The following point does not fit into the Chapter structure.]

Pressure to maximise residential development numbers means that bus users will be disadvantaged by narrow roads, lack of through roads and/or distance between home and bus-stop. The Local Plan should ensure that public and sustainable forms of transport (e.g. cycles and walking) are properly designed into housing masterplans from the outset.

6.0 Character, Design and Heritage

Policy CDH02 (Sustainable and Inclusive Design)

This, Policy ECC01 (Mitigating Climate Change) and related draft Policies are well-intentioned but do not go far enough. For example, although there are statements about carbon reduction they refer entirely to emissions in use, there is no mention of the equally important need to reduce embodied carbon.

Nor are many meaningful standards set with regard to energy, emissions or waste, either in the draft Plan or in the Council's SPD on Sustainable Design and Construction. And the only reference to promoting a circular economy is a reference to Policy S17 in the London Plan.

The simplest way of reducing the very substantial environmental impact of new construction is to minimise demolition and new building. Instead, the Council should encourage retention and adaptation of existing buildings wherever practicable.

Policy CDH04 (Tall Buildings)

We share FORAB's concerns about the application of this policy in predominantly low-rise neighbourhoods. In many parts of Chipping Barnet, blocks of 6-7 storeys would seriously intrude into views from nearby open spaces and the Green Belt. Green 'lungs' that separate neighbourhoods and give them identity are particularly vulnerable in this respect. Cases in

point are TfL's proposed row of slabs lining Barnet Hill, blurring the distinction between the hill-top settlement and the low-rise suburbs of Underhill and Oakleigh, and Fairview's blocks looming over the tree-tops of Victoria Recreation Ground.

A critical point not addressed in the Policy is the detrimental effect of tall buildings sprinkled across the borough. One of the pleasures of parts of Barnet is the illusion of countryside. The upper Dollis Valley is a good example, where only Barnet House and Angle House currently interrupt the green horizon. If additional towers are allowed to straggle randomly along the A1000, this effect would be destroyed. It would be better to designate locations where clusters of tall buildings would be permitted, with substantial distances between clusters.

6.11 Climate Mitigation and Carbon Reduction

See comments above (6.0 Character, Design and Heritage and Policy CDH02).

6.16 Tall Buildings and Barnet's Skyline

6.16.4 For reasons stated above (Policy CDH04 and elsewhere), we welcome the Council's intention to produce an SPD on Building Heights setting out parameters for tall buildings.

6.16.8 Map 4 – Locally important views

We believe that more than four views need safeguarding. In Chipping Barnet, the 360° panorama around Whittings Hill is remarkably green and unspoiled despite the proximity of extensive suburbs. Others need identifying as a matter of some urgency, ideally in conjunction with the SPD on Building Heights.

6.20 Landscaping, Trees and Gardens

6.20.1-6 & Policy CDH07 Amenity Space and Landscaping

We would like to see an explicit commitment to the value (visual and environmental) of retaining front gardens in suburban residential streets.

8.3 Barnet's Community Infrastructure

Policy CHW01 (Community Infrastructure)

Add 'medical and dental services' to the 1st paragraph.

8.12 Healthy and Green Barnet

8.12.1-2 Add a reference to the value of open spaces and green infrastructure for physical and mental health and wellbeing, exemplified by city and care farms.

10.5 Green Infrastructure

10.5.10-12 & Policy ECC04 (Barnet's Parks and Open Spaces) e)

The BPOSS assessment of open space quality and value produced some bizarre conclusions. Within the Chipping Barnet area alone, for example, spaces deemed 'low quality, low value' included Monken Hadley Common & Wood, Ravenscroft Gardens, Rowley Green Nature Reserve, King George V Playing Fields and Highlands Gardens (to name just some). Such a ranking would astonish the many who use and love them.

10.5.24 Green Belt /MOL

Policy ECC05 (Green Belt and Metropolitan Open Land), a) i

Add a reference to the Government's advice on the role of the Green Belt in the planning system published 22 July 2019.

11.0 Transport and Communications

Please refer to our points 4.19-23 above.

We regret that there is no mention of transport innovations such as affordable very rapid transit (AVRT).

11.4 Sustainable Transport

11.4.3 Recognition should be made of the likely growth of e-cycling, which overcomes Barnet's topographical challenges.

15 Schedule of Site Proposals

Site 44, High Barnet Station

We generally support the building of some housing and upgrading of the public realm. But we fear that a great opportunity to reconfigure High Barnet as a transport modal interchange is being lost. We are also highly critical of the overbearing mass of 6-7 blocks proposed (see our comments on Policy CDH04 above). And we have serious reservations about the loss of so many car parking places (see our comments 4.20 & 23 above). In our view, the indicative residential capacity of 292 dwellings is over-optimistic.

Site 45, Whalebones Park

We are opposed to the building of so many homes on this site, and wish to see more imaginative use of the open space for educational, therapeutic and food production purposes.

Site 52, Kingmaker House

We object to the quantity of units proposed on the grounds of overdevelopment and its damaging impact on both New Barnet's civic realm and the residential Lyonsdown Road.