

THE MAYOR OF LONDON'S DRAFT LONDON PLAN: RESPONSE OF THE BARNET SOCIETY

2 March 2018

INTRODUCTION

The Barnet Society is a non-political organisation with some 400 members that seeks to influence government on aspects of planning and the environment in and around the parliamentary constituency of Chipping Barnet.

We welcome the wide scope and far-sighted thinking of the draft London Plan, and agree with most of its policies.

However, as an area with important links to neighbouring Outer London boroughs and Hertfordshire, a high proportion of green space and a distinctly hilly landscape, we do not believe the draft Plan is sufficiently sensitive to local differences of geography, historical identity, or to suburban architectural and landscape character.

Our chief reservations are detailed below. Given our limited resources, we focus mainly on topics of special interest to us: town centres, design, housing, green infrastructure and transport.

Although not a criticism of the draft Plan itself, we feel we should record our doubts as to whether

1. the necessary government and other funding will be found;
2. the council, private and non-profit partner organisations essential to realise the Mayor's vision will in fact co-operate; and
3. there will be sufficient scrutiny of the expenditure and outcomes of the Mayor's funding. This was clearly absent from the previous Mayor's initiatives.

For housing in particular, it is also plain to us that new (or revitalised old) mechanisms are needed to address the urgent shortage of affordable and social housing.

CHAPTER 1 – PLANNING LONDON'S FUTURE

Para 1.2.6

The proposal for a National Park City is quite consistent with our own aims, which are to defend the range and quality of Chipping Barnet's open spaces.

From published information to date, we are unclear how the National Park City would sit alongside our own Council's strategy for parks and open spaces. The latter is well-intentioned but lacks local plans or funding. If the London Plan can galvanise a more proactive Council approach to park and open space planning and management – and offer access to funding and sanctions for failure to protect and enhance them – we would gladly support it.

CHAPTER 2 – SPATIAL DEVELOPMENT PATTERNS

Policy SD2 – Collaboration in the Wider South East

In view of our close links with Hertfordshire, we are glad the Mayor intends to work with partners across the WSE on transport and other issues facing the WSE. We would like to see explicit commitment to improving and harmonising cross-border transport planning and

Oyster usage, especially with regard to bus connections between town centres, transport hubs, hospitals, schools and colleges.

Policy SD6 – Town centres

We welcome the Mayor's commitment to promoting and enhancing the vitality and viability of town centres like ours, and his recognition of the importance of balancing the demands of housing and commerce, including affordable business space.

We agree that higher-density development is a promising way forward – but only provided that it is carried out on a scale that relates to existing neighbouring buildings and greenery, and that its design is of high quality.

Although in principle transport hubs are logical places for intensified use, it should be noted that none of the three rail stations within or adjoining our area – High Barnet, New Barnet (Network Rail) and Totteridge & Whetstone – directly adjoin their local shopping streets, nor do they connect well with existing bus services. There are also limits to development around High Barnet Station without eroding the vegetation which makes it one of Chipping Barnet's attractive 'green gateways'.

We wish to make it clear, too, that we would not welcome indiscriminate densification of residential areas more than a short walk from High Streets and transport hubs – much less than the 800m specified in Policy H2 (see below). It would only be acceptable on brownfield sites and at heights to suit our suburban context.

CHAPTER 3 – DESIGN

Policy D1 – London's form and characteristics

We strongly support the importance of high standards of design and sustainability, both for buildings and external spaces. We agree with the Mayor's list of considerations for form, layout and design development.

Policy D2 – Delivering good design

We welcome the Mayor's advocacy of high quality design, and of design review to assess and inform design options early in the planning process.

In D2F, however, please clarify which types and sizes of development should be reviewed, and whether it would apply to both publicly and privately promoted projects, as it would be impracticable to review every development.

Para 3.2.5

It would be helpful if the 'exemplary design standards' could be defined, or links provided to authoritative sources.

Para 3.2.7

This refers to the Mayor's guidance on design reviews, but we have been unable to locate that guidance, so a reference would be useful. Its relationship (if any) with Design Council CABI's *Design review – principles and practice* <https://www.designcouncil.org.uk/what-we-do/built-environment/design-review> should be clarified.

Para 3.3.8

The reference to BS 8300 as guidance on inclusive design should specify the latest version, 2018. Earlier versions focus mainly on physical difficulties; the latest version is a significant advance in recognising sensory impairment, neurodiversity and mental health as salient factors.

Policy D6 – Optimising housing density

We strongly agree with Section A that

The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to:

1) the site context

2) its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL)

3) the capacity of surrounding infrastructure.

These are insufficient, however, in neighbourhoods like ours where significant areas of Green Belt and Metropolitan Open Space border – and often penetrate – the 800m-radius zones proposed by Policy H2. And while Para 4.2.7 prevents inappropriate densification within Conservation Areas, it says nothing about developments immediately outside their borders. Impact on views from, and towards, Conservation Areas and significant green spaces should therefore also be a consideration.

CHAPTER 4 – HOUSING

Policy H1 – Increasing housing supply

We accept the Mayor's ten-year target for net housing completions of 3,134 p.a. for Barnet.

Policy H2 – Small sites

We have severe reservations about Section D.2.d's *presumption in favour... within PTALs 3-6 or within 800m of a Tube station, rail station or town centre boundary [of] infill development within the curtilage of a house*. We have seen numerous applications for such infill in our area, but rarely to the satisfaction of either neighbours or planning committee.

4.2.9

We agree that loss of existing biodiversity or green space as a result of small housing developments should be mitigated.

We also believe that loss of any public green space should be compensated for with alternative accessible sites.

Para 4.6.5

We support the Mayor's belief that public sector land can play a significant role in meeting affordable housing need, and would like to see such developments giving priority to key public service workers. But the definition of 'affordability' in the Glossary is insufficiently robust.

Policy H7 – Affordable housing tenure

We support the Mayor's commitment to various forms of affordable rent and shared ownership, but would like to see more positive support for social housing. Social housing

should be specified as general needs rented accommodation with a subsidised rent provided by Local Authorities or Housing Associations. Also, a percentage of this type of housing should be designated for key workers.

Policy H10 – Redevelopment of existing housing and estate regeneration

We support the proposal that no general needs rented accommodation or supported housing should be lost on regeneration schemes.

Para 4.12.2

This is the only reference to under-occupation. In suburbs like Barnet there are many elderly people living in family-sized accommodation, and we would like to see incentives to encourage them to downsize or let spare bedrooms to students or low-earners – without, of course, any pressure, threats or harassment.

CHAPTER 5 – SOCIAL INFRASTRUCTURE

Para 5.3.6

A reference should be added to the Department for Education/Education & Skills Funding Agency publication BB 104 (2015) *Notes on area guidelines for SEND and alternative provision*:

<https://www.gov.uk/government/publications/send-and-alternative-provision-area-guidelines/notes-on-area-guidelines-for-send-and-alternative-provision-bb104>

CHAPTER 8 – GREEN INFRASTRUCTURE & NATURAL ENVIRONMENT

We particularly welcome this chapter, and especially its recognition of the vital importance of maintenance and value measurement.

Policy G2 – London’s Green Belt

We agree that the enhancement of the Green Belt to provide appropriate multifunctional uses for Londoners should be supported – but more detailed guidance is needed as to what is ‘appropriate’. We do not believe that this includes multi-use games areas with high security fencing, floodlighting and artificial surfacing, for example.

We would welcome more use of green spaces – which are a major feature of our area – for pedestrian and cycle travel between neighbourhoods.

Para 8.3.2

We would like to see encouragement of cross-borough co-operation (including councils outside the GLA), as recognised in Policy G4.

Policy G5 – Urban greening

We commend the Urban Greening Factor concept, and Table 8.2 will be a valuable tool.

Para 8.6.2

We agree fully with the protection of wildlife habitats including ‘vegetated railway corridors’, and would like to add that excessive clearance of, or damage to, trees and plant growth along railway and road corridors (including grass verges) should be avoided.

Para 8.6.5

We would like canals to be mentioned explicitly, for the avoidance of doubt.

CHAPTER 10 – TRANSPORT

Para 10.1.1

While we support restraint of vehicle use, it must be recognised that in Outer London boroughs such as ours residents are inevitably more dependent on cars. Increases in housing and population will result in increases in motor traffic in Barnet and throughout London, with the propensity for longer delays and increased pollution. A concerted effort will be necessary to keep both private and public transport moving efficiently. This should include road building, more effective traffic flow systems and high-tech innovations such as smart traffic lights.

Para 10.3.2

We agree that there is an urgent need to improve public transport capacity, connectivity and quality of service to ensure that it continues to cater for London's growth. As noted above under Policy SD6, our town centre tube and bus services are not well integrated, and east-west connections are often poor for both public and private transport.

The situation has been exacerbated by TfL's recent reduction of bus and tube frequencies on several routes. If higher densities are to be acceptable in our area, radical transport improvements will be essential and must be acknowledged in the Plan.

In principle transport hubs are logical places for intensified use, and there may be scope at our tube and rail stations for building above car parks, tracks and the stations themselves.

However there are considerable planning and technical challenges associated with all our existing hubs. High Barnet Station, for example, abuts the unstable 19th century embankment carrying the A1000 on Barnet Hill, and is surrounded by trees and the open hillside that was the historic site of Barnet Fair. Its natural surroundings makes it one of Chipping Barnet's attractive 'green gateways' that would be lost if medium or high-rise development were permitted around or above the station.

Para 10.3.6

We welcome the Mayor's recognition of the importance of orbital bus connections. Our bus connections north into Hertfordshire are also poor. Our large and growing population of students and elderly residents are particularly dependent on buses between shopping centres, stations, schools, colleges and local hospitals, but has not benefitted from proportionate levels of investment as Central London. Users are also disadvantaged by Oyster anomalies around our border with Hertfordshire.

More detailed guidance and concrete proposals in the Plan would be welcome.

Paras 10.4.1-4

Making it easier for people to use buses is not only about the network and service frequencies. It is also about their ability to serve new housing developments. Boroughs must consult London Buses at initial planning stage. Medium and large new housing developments will need distributor and access roads, which must be wide enough for

conventional buses to use (6.5m). Developers often argue for 5.5m widths on the grounds that fewer homes would result, but when asked they are unable to quantify the number.

Road layout is important. Boroughs should presume a through bus route requirement as this increases the range of destinations available. A crescent-shaped access off a main road is very suitable and does not encourage rat-running. Culs-de-sac bus access is not encouraged in residential areas as it involves double running, which is not attractive for through passengers. Maximum walk distance between any dwelling and bus stop should be 400m – this an actual and not an airline measure, and should mean that most dwellings are well within this standard.

A reference should be added to the Chartered Institution of Highways & Transportation publication *Buses in Urban Developments*, principal author Tim Pharoah (2018): www.ciht.org.uk/en/document-summary/index.cfm/docid/1D79344D-A8E9-429B-A0C6710299356BCD

Transport – generally

The Mayor should encourage more orbital links – including tram, light rail and affordable very rapid transit (AVRT) – across or beneath the Green Belt where necessary – to link new destinations on either side of the borough. We welcome the positive findings of the recent feasibility study of a potential West London Orbital Railway, and would like the study extended to include Brent Cross, Mill Hill East, Finchley Central, Finsbury Park and a possible link with the Gospel Oak-Barking line. Potential new orbital routes further north should also be investigated.

As mentioned above under Policy SD2, we would like to see explicit commitment to improving and harmonising transport planning, delivery and full Oyster compatibility across the GLA boundary.

These and other imaginative transport and infrastructure improvements will be essential if the Mayor's vision of intensified suburbs in Chipping Barnet are to receive residents' support.