

## **BARNET DRAFT LOCAL PLAN**

### **FBWRA RESPONSES TO DRAFT BOROUGH PLAN MARCH 2020**

These responses are submitted on behalf of Friern Barnet & Whetstone Residents' Association (FBWRA). They focus on certain issues which we see as being of particular importance.

#### **1. Terminology used**

Whilst it is appreciated that those charged with writing the draft Plan will no doubt have been keen to ensure that, as a document, it attracts and retains the reader's attention, we believe that the variety of the terminology used in framing the Policies creates confusion and uncertainty and that greater precision of drafting is required for a document that will inevitably be subject to technical and legal interpretation.

To illustrate the point, consider the following examples:

Policy HOU01 Affordable Housing:

The Council will ... *expect...require...seek*

Policy HOU04 Specialist Housing:

1. Proposals for people with social care and health support needs *should...*

2. Proposals for new HMOS *must...*

3 Proposals for purpose built student accommodation *should...*

4 Any proposals for large scale shared-living accommodation *will be expected* to demonstrate...

Does "expect" mean the same as "require"? If not, what is the difference in terms of the extent of the policy? If the meaning is the same, why create uncertainty by using different words? What is the difference between "expect" and should? Etc, etc. Such ambiguities need resolving throughout the document.

#### **2. Housing**

In Chapter 5, at paragraph 5.5.5, it is explained that in Barnet one and two bedroom homes remain the dominant type of new accommodation delivered , accounting for 78% of new homes overall and 86% of flats. *"In the past a family property would traditionally consist of three bedrooms or more. Many families now live in two bedroom accommodation. Well designed two bedroom properties of between 70 and 79 sq. m gross internal area can now be considered as family homes"*

That families are living in two bedroom accommodation, well designed or otherwise, does **not** mean that such accommodation can be considered as family homes- it merely means that families are living in such accommodation because true family accommodation is not available at a price they can afford – or at all.

Whilst we would accept that two bedroom accommodation can be suitable for the families with one or two very young children, as time passes and those children grow older such accommodation

ceases to be suitable- in fact, it becomes unsuitable. In the long term, two bedroom accommodation can only be considered as suitable for a family with one child- certainly not for a family with children of more than one sex. Is Barnet intent of pursuing a Chinese- style “One Child Policy”?

Paragraph 5.5.5 needs to be re-written to make it clear that whilst it is recognised that many families are forced to live in two bedroom accommodation, this is often from necessity and that two bedroom accommodation cannot be considered as suitable for anything but the very smallest, or the very youngest, families.

The second sentence of Paragraph 5.5.10 should be amended to read “ There is a significant need for family sized housing ***of 3 bedrooms or more*** to be provided as part of any market housing mix”

Policy HOU02- Housing Mix: A mechanism and statement as to how the policy will be applied to individual proposals is required. Compliance should be expressed as a “requirement”, not an objective (“seek”). This could integrate with the “Assessed need for housing type by tenure” contained in Table 6, with worked examples and rounding up to the larger sizes. For example, a 10 unit market scheme would be required to provide 3 2 bedroom, 4 3 bedroom and 3 4 bedroom (or larger) units.

### **3. Conversions**

The principle of Policy HOU03 is welcomed, but the draft requires amendment:

Rather than “the Council will only support..” proposals where the criteria a)-c) are satisfied, the language should be firmed up- “the Council will require that... ( with consequent redrafting).

Paragraph b): 74 sq.m. GIA does not constitute a “larger family sized home”. See above. The minimum should be increased. 74 sq. m. is appropriate for a 2 bedroom property , not 3 bedrooms ( Compare with para 5.5.5 ( commented on above)

The “location test” at a) is all very well, but it will encourage conversions of family homes close to town centres. We believe that the current DM01 policy has great merit and should be included in HOU03d( see below)

Further , clear wording to shut out other types of proposal is desirable, such as

- proposals for conversions of smaller homes (of less than 130 sq. m. original GIA) will be refused
- proposals for conversions outside locations within an area falling within a) and also proposals for conversions in streets characterised by houses within an area falling within a) will be refused
- in paragraph c), additional text should be included to prescribe the minimum original area where more than 2 units are to be formed

#### **4. Car Parking - in the context of new housing provision – the practice of using the streets as a dumping ground for overspill parking.**

One of the consistent features of planning outcomes in Barnet has been a willingness of the Council to allow on-street parking to count towards car parking provision required for new residential developments and conversions. This has had the consequences that the Borough's roads have become increasingly difficult to navigate, with parked vehicles narrowing the available carriageway resulting in increased congestion, pollution and longer journey times and also, as much parking by residents in proximity to their homes is long term (as many travel to work by public transport, leaving the car behind), the pool of on-street parking spaces available for short term parking by visitors to an area – whether tradesmen, shoppers or others is diminished.

Paragraph 11.6.5 states “Where development proposals are on the edge of a CPZ, to ensure there is sufficient on-street capacity, a parking survey will be required of the streets outside the CPZ.” – thus demonstrating that the authors of the plan envisage the practice of using the streets as a dumping ground for overspill parking will continue!

The cause of the problem is twofold-

First, the willingness of the Council to allow on-street parking to count towards required car parking provision and, secondly, the use (in common with many other local authorities) of the so-called “Lambeth Parking Survey” model. We believe that the Lambeth model is fatally flawed and should no longer be used by Barnet Council. The Lambeth model focusses on measuring parking availability for residents living in the immediate vicinity of an application site. Thus the Lambeth guidelines state (for residential developments) :

*“The Council requires a parking survey to cover the area where residents of a proposed development may want to park. This generally covers an area of 200m (or a 2 minute walk) around a site “The survey should be undertaken when the highest number of residents are at home; generally late at night during the week. A snapshot survey between the hours of 0030-0530 should be undertaken on two separate weekday nights (i.e. Monday, Tuesday, Wednesday or Thursday).”*

It will be seen from the above that the purpose of the survey is to demonstrate that there is sufficient on-street capacity to accommodate overnight “overspill” parking from the proposed development. The methodology fails to measure **or to protect** daytime availability for short term parking.

Further, Policy TRC03 provides for a maximum level of parking provision, not a minimum. In the context of a need to protect the availability of short term on-street parking for visitors to a locality it follows that a policy which sets a maximum, but not a minimum is flawed. This needs to be addressed .

We propose that:

1. The Plan commentary should expressly recognise that long-term on- street parking by residents of new residential developments and conversions is unacceptable and that all anticipated long term parking needs of the residents of such developments must be met by on-site parking provision.

2. Policy TRC03 should be amended to read “ a) the Council will require that residential development (including conversions) will provide on-site parking in accordance with Table 23 and so as to accommodate on-site all anticipated long term parking needs of the residents . For multi-unit proposals the maximum parking provision will be rounded up to the next whole number.”

3. Barnet abandons the Lambeth methodology and, in exceptional cases where a car parking survey is still needed, adopts a replacement that addresses availability of day time parking for short-term use. Note that 11.6.5 would need revision.

## **5. Car parks**

Policy GSS12 supports the development of surface level “public car parks” subject to provisos. The proviso that parking spaces can be demonstrated as being surplus to requirements, or re-provided as needed” should be strengthened so that proposals which do not satisfy this will be refused, not merely “not supported”.

It should be clarified in GSS12 itself that this policy only applies to Council owned car parks. However similar tests should apply for the protection of other (private) car parks, such as those located at identified potential development sites (including TfL Underground stations) as these too form much needed parking facilities.

## **6. Tall Buildings – and not so tall**

Policy CDH04 should be amended to make it clear that the statement at paragraph 6.4.1 applies to the consideration of proposals for tall (and very tall) buildings- “The Council will not approve designs for new development that is inappropriate to the local character”

Paragraph 6.16.5 states that proposals for “Very Tall” buildings will not be supported outside Opportunity Areas. This needs firming up- “will not be permitted “ would be better.

The various references to “above ordnance datum” seem misconceived- surely the appropriate reference point is “above local ground level”?

A “tall building” is defined as one of 8 or more storeys and CDH04 is intended to protect against inappropriate development of such structures. However, a building of less than 8 storeys may be inappropriate in many locations and we suggest that this needs covering in the express policies. We propose that Policy CDH01, which already recognises the relevance of height, should be firmed up along the lines of paragraph 6.4.1 quoted above.

## **7. Basements**

Policy CDH06, Basements is welcomed, but c) should be extended to expressly require that there is no demonstrable adverse effect on neighbouring properties, not merely on groundwater conditions.

## **8. Infrastructure and healthcare provision in the context of new housing provision**

Whilst it is appreciated that provision of healthcare facilities and staff capacity, and of some other types of community infrastructure, is not a direct function of the Council as planning authority, nevertheless the Council is a “gatekeeper” for the approval of development proposals which either individually or cumulatively will impact significantly on the level of local demand for primary healthcare or other services and facilities.

In order to protect the availability of such services and facilities (which are already under stress) for existing local residents as well as to ensure they are available for residents of new residential accommodation, a mechanism is required to ensure that large new residential developments are not brought into use unless and until an objective assessment demonstrates that the necessary services are available at an appropriate level in appropriate locations.

We suggest appropriate additions in the Policies set out in Chapters 5 and 8.

## **9. New Southgate Opportunity Area**

The physical extent of the Opportunity Area should be more precisely identified in the next draft. Depending on that the question of whether the whole of the Area, or just part of it, is potentially suitable for Tall and/or Very tall Buildings will need consideration. Failing that, there is a risk of putting “cart before horse”.

## **10. “A Thing of Beauty is a Joy Forever”**

Whilst the draft plan contains many references to “good design”, “exemplary architecture” and the like, we were unable to find any reference to “beauty”. We suggest that reference should be made to the “Building Better, Building Beautiful commission report” and the draft plan then updated to incorporate the appropriate principles. Good design may be purely utilitarian and that is not good enough for our Borough.

## **11. Responses of FORAB and The Finchley Society**

We generally support the responses of FORAB and The Finchley Society, which we have had the opportunity of reading.

David Thompson,

Chairman, Friern Barnet & Whetstone Residents’ Association 12 March 2020