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02.08.21

Dear Sir/Madam,

We would like to submit the following representations to the draft Barnet Local Plan, on behalf of Combined Finchley LLP, the developer in contract with TfL to purchase the vacant East Finchley Substation. The comments relate to Strategic Site Allocation 25 in the draft Local Plan.

The developer is currently in formal pre-application dialogue with the Council's Development Management department.

Allocated Site 25: East Finchley Substation

The site is proposed to be allocated for a majority residential development (95% of the floorspace), with the remaining 5% for commercial (office) use. The indicative capacity for the site varies between 23 and 29 units within the draft Local Plan.

The justification for this use allocation is that the substation "*is no longer in use for infrastructure, and this highly accessible location offers an opportunity for redevelopment ... that does not have a negative impact on the nearby town centre*"¹.

We agree that this site is optimal for development that utilises the sustainable location (PTAL 4), and draws footfall from the locality rather than from further afield. However, the nature of the site suggests that it is more suited to a greater mix of uses than those draft allocated.

Firstly, the site is host to a number of established and protected trees, as well as having varied ground levels, meaning any potential development must heed these landscape considerations. In order to maximise the preservation of the tree canopy, a smaller overall proportion of residential use on the site is required in order to lessen the post-development pressure with regards to pruning and other forms of maintenance. A higher proportion of commercial (office) use at the lower levels of any development would be more appropriate, as office space is better suited to shade and the varying topography.

¹ p326

Secondly, the current site allocation assumes that town centre uses other than residential are not suitable at the site, in that they may have a 'negative impact' on the existing town centre. This rationale would certainly apply to out of centre locations which are purely residential in nature. However, this site occupies a position as the "entranceway"² to East Finchley town centre, which as a district centre is second in the town centre hierarchy for the borough. Indeed, Policy SD7 of the London Plan acknowledges that where edge of centre locations are "*well integrated with the existing centre, local walking and cycle networks, and public transport*"³, town centre uses can be appropriate. This site fulfils all of these criteria. Further, it occupies a transitional location between the residential Bishops Avenue, and the High Road which extends north from the railway bridge. There are a number of other mixed use developments in the vicinity of the site, marking this movement from residential area to the town centre. Please see the enclosed diagram, illustrating ground floor uses in the vicinity. Clearly, in reality, the town centre extends south of the railway line, despite the current policy boundary not recognising this, and this ought to be remedied.

Due to the landscape constraints of the site and its location on the edge of East Finchley town centre, we believe the site would best serve the area through being allocated for mixed use development comprising a lower proportion of residential and a higher proportion of other town centre uses.

Further, while the draft Local Plan does not explicitly deal with the design of the cycle network within its policies, the allocation of this site for development necessitates the examination of the recently created cycle lane that runs alongside it. This cycle lane was extended as a response to the Covid-19 lockdown period in September 2020, as a method of promoting alternative transport methods under the Central Government's Experimental Traffic Management Orders. These were designed as temporary installations, however, Barnet's Long Term Transport Strategy does identify the provision of sustainable transport facilities along the A1000 as a future goal. We encourage the provision of cycle facilities along this portion of the road, however, the current cycle lane extension does not maximise cyclist amenity.

Further, any development on the site will require a number of vehicles to have access to the site, for deliveries, servicing, and blue badge parking at least. This is made extremely difficult with the current cycle lane, which at present runs from the North, beneath the bridge and then past the substation and beyond for a very short stretch. To the other side of the road the cycle lane only begins just before Bishops Avenue in what we consider to be a very unsatisfactory manner for seasoned cyclists. An alternative approach is therefore proposed, to provide the equivalent length of cycle lane on the other side of the road. We believe the loss from shortening the cycle lane on the side of the substation will be mitigated through significant improvements to the opposite lane, and by the ability to provide a safe and well managed vehicle access to the substation site.

Finally, we support Policy GSS09, which "*highlights residential led mixed-use opportunities for design-led infill development on the major thoroughfares of Barnet as shown on the Key Diagram. Although there has been a loss of original residential character along these routes there is an opportunity for infill development including Tall Buildings (where appropriately located on Edgware Road (A5) and Great North Road (A1000)) to have a positive impact on the environment of the thoroughfare*"⁴.

² Draft Local Plan, p326

³ P86

⁴ Para 6.18.9

Yours sincerely,



Luke Raistrick
Managing Director
Centro Planning Consultancy

KEY

- Residential
- Non-Residential
- Station
- Town Centre Designation



EAST FINCHLEY SUB-STATION
Ground Floor Uses Plan

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