



RESPONSE

to the

DRAFT GOLDERS GREEN STATION PLANNING BRIEF

From:

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1. Introduction

1.1 This is a response to the London Borough of Barnet (LBB) Golders Green Draft Planning Brief. The Association is mentioned at paragraph 11.3.6 of the Draft.

1.2 The Council of the Association passed a unanimous resolution at its meeting on 2nd May 2017 requesting its Chairman to express the Association's serious reservations regarding the Brief by means of a response to it.

2. The Hampstead Garden Suburb Residents Association (RA)

The RA represents approximately 1,800 households and 4,500 people living in the Hampstead Garden Suburb Conservation area. It was founded in 1910 shortly after Golders Green and Hampstead Garden Suburb were built.

3. Summary

This is a summary of the points made in the RA's response: **communication** by LBB with stakeholders has been wholly inadequate. (Para 4).

3.1 The Brief ignores national, regional and local policy **guidance**. (Para 5).

3.2 The **assessment of the plan's effect on the surrounding area including several conservation and other areas** – including the detrimental impact of tall buildings - is abysmal. (Para 6).

3.3 The 49-page Brief is meandering, vague and full of alleged "justifications" but contains **little evidence of any substantial thought about the impacts** – of over 1,000 new properties - on conservation, drainage/water run-off, light, overlooking, pollution and social aspects such as the impact on schools and health services. (Para 7).

3.4 Minimal regard has been paid to vital **roads and traffic** considerations (Para 8).

3.5 The RA has concluded that the Brief is a wholly inadequate document and should be withdrawn in its entirety. (Paras 9 and 10).

4. Communication

Notwithstanding that the RA is mentioned in the Brief, it was not told that a Brief was being prepared nor asked to comment on the Brief before publication and we learned about the existence of the Brief through other sources. That is wholly unacceptable.

5. Guidance

5.1 The Brief takes little, or no, substantive account of Guidelines as set out in, for example:

5.1.1 The National Policy Planning Framework

(https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf)

5.1.2 Historic England's Advice Note on Tall Buildings

(<https://content.historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/heag037-tall-buildings.pdf>)

5.1.3 Historic England's "Seeing History in the View"

(<https://content.historicengland.org.uk/images-books/publications/seeing-history-view/seeing-history-in-view.pdf>)

5.1.4 Mayor of London's London Plan (<https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-2016-pdf>)

5.1.5 The Barnet Local Plan (<https://www.barnet.gov.uk/citizen-home/planning-conservation-and-building-control/planning-policies-and-further-information/Adopted-Local-Plan---Core-Strategy-DPD.html>)

5.1.6 The Barnet Air Quality Management Area Order (referred to at <https://www.barnet.gov.uk/citizen-home/environmental-health/air-quality/review-and-assessment-of-air-quality.html>)

5.2 As a consequence of failure to give due weight to the above guidelines the Brief -

5.2.1 has been drafted with little apparent understanding of best national, regional and local practice;

5.2.2 is premature in advance of the Council's policy for the future of the overall town centre;

5.2.3 fails to undertake a proper analysis of the townscape;

5.2.4 fails to take proper account of the historic environment, heritage constraints, views and panoramas and to give sufficient weight to these issues;

5.2.5 contradicts local policy, and ignores national policy, as regards tall buildings;

5.2.6 is misleading to TfL, residents, stakeholders and potential developers.

6. Conservation and Environment

6.1 The importance of Hampstead Garden Suburb (HGS) in the history of 20th Century architecture and town planning is highly significant. Laid out by Raymond Unwin, with Edwin Lutyens, Suburb properties represent the best of English domestic architecture of the early twentieth century.

6.2 HGS is an environment of international significance. The eminent architectural historian, Sir Nikolaus Pevsner, described it as "the most nearly perfect example of that English invention and speciality, the garden suburb". A history of HGS can be read here: <http://www.hgstrust.org/the-suburb/history-of-the-suburb.shtml> and character appraisal documents can be downloaded from: <http://www.hgstrust.org/the-suburb/character-appraisal.shtml>

6.3 HGS is one of a very small number of areas in England with a Scheme of Management. The Scheme (<http://www.hgstrust.org/documents/scheme-of-management.pdf>) is administered by the HGS Trust.

6.4 LBB and the Trust have jointly issued guidance for the HGS conservation area: <http://www.hgstrust.org/documents/property-design-guidance.pdf>. No account of this guidance appears to have been taken in the Brief.

6.5 Many properties within adjoining roads in HGS are nationally or locally listed and should on no account be demolished to make way for new access roads to a new development.

6.5 The Brief ignores the fact that the sites are completely unsuitable for a "tall building" or indeed any building more than three stories high. The area concerned is a sensitive location containing as it does Conservation Areas, Listed Buildings and a Listed Monument. Any new building must be lower at all points than the existing height lines of the Hippodrome and listed Shopping arcades, to ensure it is in keeping with these other buildings in a conservation area.

6.6 The Mayor of London wishes to protect historic views. Views from HGS, the Heath Extension, and Golders Green Crematorium (the last omitted entirely from the Brief) were specifically designed to be free of tall buildings apart from the Churches and the Institute – an uninterrupted tree line, visible on the main arterial roads (e.g. the North Circular and the A41). The Brief pays no attention to such issues.

6.7 Undercroft developments elsewhere are disliked. They are anti-social, dirty, dingy, and unpopular. If a building is erected over the bus station, the air inside can become polluted – an example is Victoria Station.

6.8 The Mayor of London has emphasised the dangers of pollution and the importance of creating lungs for London. The Brief runs completely counter to this policy with potentially more traffic congestion and toxic emissions. The LBB website section on Air Quality Monitoring in the Borough at <https://www.barnet.gov.uk/citizen-home/environmental-health/air-quality/air-quality-monitoring.html> has a link to a report entitled: 'Review and Assessment of Air Quality Updating and Screening Assessment 2015 Action Plan Progress Report.' The Executive Summary to this report singles out Golders Green Bus Station as having 'elevated concentrations' of Nitrogen Dioxide. The detailed table on Page 22 to this Report shows clearly that the National Express Bus Stop at Golders Green Bus Station had the highest concentration of NO₂ in the whole of LBB in 2014 running at 78.4 where the legal limit is 40. This is not a one off: the analysis on Page 23 for the years 2010-14 also show NO₂ levels of 78.4 for this location and again the highest level for the whole of the Borough. Enclosing the bus station and building a concentrated housing project would only serve to worsen the position.

7. Other Impacts

7.1 The Brief pays no heed to social and other impacts.

7.2 The War Memorial, erected in 1923 was funded by the residents of Golders Green and forms an important focal point of the town centre. The demolition of this listed structure and rebuilding in another location will be regarded as heritage vandalism by local residents and grave disrespect to those who gave their lives defending our country. There is potential for enormous offence and upset.

7.3 There is a perception that high density developments and lack of open spaces leads to an increase in crime. There is already concern about the increase in crime in the vicinity of Golders Green Bus Station and there is no explanation given as to what might be done to restrict this escalating if the new development were to proceed. Up to date figures from the UK Crime Statistics website for the Golders Green Station area which you can read at <http://www.ukcrimestats.com/Postcode/nw117rn> show that Golders Green Bus Station is already experiencing high levels of crime compared to the rest of the UK with a marking of 62.901 out of 100 (where 100 is high) for all crime excluding anti social behaviour, and 78.611 (out of 100) for robberies. These statistics are shocking and the expansion of the bus station will exacerbate the fear of residents living in this area.

7.4 Most GP surgeries in Golders Green already have long waiting lists, and Emergency Services, the A&E facility at the Royal Free Hospital (which serves the area for emergencies) is working to full capacity. The Brief does not pay any heed to this issue.

7.5 Golders Green does not need more retail shops. Physical shopping is taking a hit in the age of the internet; this is likely to become even more evident in years to come. On the other hand it has plenty of cafes and restaurants which contribute to its current character.

7.6 There is currently a serious shortage of schools available for local children. The council is not creating new schools and will not have the financial resources to do so. Will the developer pay for new educational facilities and, if so, where will they be located as there is a shortage of available land.

8. Roads, Traffic and Controlled Parking Zones (CPZ)

8.1 The Brief pays little attention to this aspect and we therefore consider it desirable to go into the matter in some detail. There are a number of significant concerns that would adversely impact on residents of the Suburb arising from the potential redevelopment of the Golders Green Bus Station as follows:

8.2 Section 6.1.8 of the Brief states as follows: *'The Scheme will be expected to be car-free. The surrounding area is already covered by [a] CPZ, and to ensure these areas do not experience further parking pressure, residents of the new scheme will be prevented from applying for parking permits.'* Whilst we welcome any restriction that would limit the creation of demand for additional parking permits, we do have the following concerns:

8.2.1 Estimates are that proposed living density figures equate to a minimum of 500 flats plus additional cafes, offices and shops. **Very few roads near Golders Green station in fact currently have all day parking restrictions.** Most nearby roads have 1 or 2 hour per weekday limits only. As a direct consequence, the roads with the 1 or 2 hour restrictions that are closest to the station would have even more people parked there outside those hours. Many residents already find the limited CPZ means that they suffer a lot of parking for many hours at a time beyond the controlled hours.

8.2.2 **The CPZ does not cover the whole of the Suburb.** Many of our residents already feel aggrieved that the lack of a CPZ in their roads means that commuters and staff working locally in shops, garages and offices use our roads as a free car park. Holiday-makers also park for weeks on end whilst they catch public transport to airports in order to save on airport parking charges. The National Express services to Luton and Stansted airports have particularly caused issues in this regard. Furthermore, local car related businesses use the Suburb as a car park for car club vehicles; cars being repaired or sold by businesses under the Golders Green arches, as well as car and commercial vehicle hire companies. To witness this, you only need to observe the large numbers of cars and vans parked for long periods in numerous roads within the Suburb, and especially around Central Square and Meadway as these are relatively close to the Station and also serviced by the H2 'hopper' bus route. There are also similar issues in roads accessible from the Bus Route 102 up to Golders Green Station.

8.2.3 There is already limited parking in the Suburb, with particular issues in the roads near the Station. **Conservation restrictions enforced strictly by Hampstead Garden Suburb Trust (and supported by Barnet Council) mean residents are not permitted simply to create parking spaces in their front gardens** together with a dropped kerb. You will recognise that creation of such parking has been the case in many of the roads outside the conservation areas enabling those residents to create additional parking and to restrict parking outside houses as a result of the dropped kerb.

8.2.4 We would refer you here to the LBB/HGS Trust's published planning guidance (pages 29/30) <http://www.hgstrust.org/documents/property-design-guidance.pdf> which states that permission to create a hardstanding 'will not normally be given' and also restricts the enlargement of existing hardstandings. The preservation of hedges is also vital to the conservation of the roads and houses on the Suburb (P.31) and of course the widening or creation of parking spaces results in the inevitable loss of hedges. Most Suburb houses also do not have garages, or if they do, they are too small to accommodate most modern cars.

8.2.5 **It is a misconception to assume any expectation that the Scheme will in fact be car free.** That just will not happen; there will without doubt be a large additional number of cars and thus parking requirements created by new residents and businesses. The scheme will therefore only work in our view if there is **proper and adequate provision for underground parking to support the development combined with a major extension of the current CPZ** in the Suburb both in terms of the hours and the area covered. As part of this, key workers (for instance, those teaching at the local schools, nurseries and medical practices) should be able to purchase annual parking permits to enable them to

park in certain areas as we must accept that few of these people are likely to live in the area and provision for them to commute to their workplaces and to park should be made. TfL's thoughts that site A residents should be car-free may be a carry-over from Camden's development at Kings Cross; while that may work for a central London location for young professionals, it is the wrong aspiration for Barnet that has to provide for families.

8.3 Section 6.1.10 of the Brief states that: '*Cycle parking provision at stations is considered on a site by site basis subject to discussions with TfL. At Golders Green Station, the Council will expect that minimum requirements as set out under Table 6.3: Cycle Parking Minimum Standards of the London Plan are exceeded.*'

8.3.1 It is very clear in the London Plan 2016 referred to in the Brief, that adequate cycle parking provision should be provided at Golders Green Station. Until the last few days, **the provision for cycle parking at this site has been woefully inadequate.** This is an extremely busy underground, bus and coach facility, yet there was only specially designed cycle storage for 4 bicycles. We are pleased to see that there has been some recent addition of cycle storage facilities as many people travel to the station by bicycle.

8.3.2 Any development must ensure that TfL commits to extensive secure and covered cycle storage for existing users of the station and bus service as well as for the new residents of the development.

8.4 Section 6.1.16 of the Brief refers to services such as refuse and recycling collection and requires adequate provision to be made. However, what about all the other services vehicles and trades people that will be needed to attend to a development of this size? Ambulances and other emergency vehicles will require access at all times. So too will people carrying out repairs and maintenance or landlord gas safety checks (as required annually by law for any sublet property). **Provision must be made for such vehicles for a development of this size to function properly, safely and within the law.**

8.5 **The development works themselves will without doubt give rise to a lot more local traffic.** The long construction period will itself create specific pressures with parking and access for vehicles for a large number of people working on the site. There will need to be diversion of buses and coaches together with relocation of the bus station for the duration of the construction period. The Barnet brief does not appear to mention this or set out how this long period of upheaval would be dealt with. By way of example, the housing development on the site previously occupied by Chandos Tennis Club on Britten Close just to the rear of the Golders Green Underground site off Wellgarth Road has caused huge traffic and parking problems in this immediate area. Yet the development here is relatively small and there were not dozens of buses per hour to divert as would be required at Golders Green Station. Residents of the Suburb will want to see special provisions brought in and enforced to ensure that large commercial vehicles do not enter the Suburb on their way to and from the bus station redevelopment. The additional and inevitable burden of private traffic that would short cut through the Suburb in order to avoid additional congestion around Golders Green is also of particular concern to residents.

8.6 **The safety of pedestrians is also of paramount importance.** Around 20 years ago, Golders Green underground closed its pedestrian entry and exit point onto the Finchley Road which was used by residents of the Suburb with no explanation or consultation. This has added to the pressure of people using the main concourse, which is extremely busy especially at peak times. TfL ought now to be instructed to reopen this access point and put in ticket barriers and machines in order to manage the large flow of people who arrive at the Station from buses and National Express Coaches (A1 and A6) as well as on foot from the Suburb. **How would the access of people using the underground station be safely managed whilst these development works happen?** The station cannot possibly be closed as it is a vital transport hub for the area. This aspect needs to be fully considered and properly addressed.

9. Suggested way forward

9.1 The inclusion of Site B in the Brief is entirely inappropriate. The site will not be available for many years and the inclusion in the Brief of Site B creates what is akin to planning blight on properties within and bordering the site. We understand that company, which runs the marshalling yard and depot, has just signed a new 15 year contract.

9.2 It is not possible to say with any certainty what will be the accommodation needs in the area so far into the future. For example, Golders Green has seen a large influx of people from the European Union and this has doubtless had some impact on housing requirements. However, with the departure of the UK from the EU it may well be that accommodation needs will in time be reduced in Golders Green. **It is essential that any future brief omits Site B.**

9.3 Site A only provides a modest development opportunity but potentially impacts on historic heritage assets such as the listed War Memorial and the listed Hippodrome.

9.4 If a new Planning Brief is considered desirable, it should be drawn up with prior consultation with residents and other key stakeholders.

10. Conclusion

In the opinion of the Hampstead Garden Suburb Residents Association this Planning Brief is designed to weaken the existing protections of the character and environment of Golders Green and neighbouring areas (Conservation Areas with many listed buildings). In this respect it may be unlawful.

The Association recommends that this fundamentally flawed document is withdrawn.