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Mill Hill Preservation Society The Studio, Mote End, Nan Clark's Lane, Mill Hill, London NW7 4HH
telephone: 0208 906 0769 e-mail: contact@mhps.org.uk web: www.mhps.org.uk Registered Charity No.1185939
Patron: Lady Hobson OBE JP President: Dr Michael Worms BSc PhD Hon. Architect: John Living AAdip CMdip RIBA

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For the attention of Nick Lynch – Planning Policy Manager

London Borough of Barnet
2 Bristol Avenue
Colindale
NW9 4EW

5th March 2020

Sent only by email to Nick Lynch and forward.planning@barnet.gov.uk

Consultation Response from the Mill Hill Preservation Society

Barnet Council's Draft Local Plan (Reg 18) January 2020

Plan Period 2021 to 2036

Preferred Approach Consultation

Mill Hill Preservation Society is a civic society with more than 800 members and a large following of supporters on Facebook. Our remit is to consider the postcode area of NW7 and our reading of the proposed Local Plan is in part limited to this area.

Introduction:

MHPS notes that the new Local Plan takes account of new national planning policy in the form of the National Planning Policy Framework (NPPF 2019) and a new emerging London Plan (draft 2017).

Clause 1.6 Neighbourhood Plans: We are disappointed that the Council has not acknowledged the work done by the Mill Hill Neighbourhood Forum in producing and submitting a draft plan for the Mill Hill area.

Section 2: Challenges and Opportunities:

Clause 2.4 Environment: It is important that Barnet remains one of the greenest boroughs in London. MHPS supports green spaces and low-density suburban development that form an important element of Barnet's character. Policies need to be geared to protecting and enhancing Barnet's Parks and Open Spaces that form part of Barnet's Green Infrastructure network and its intrinsic amenity value to residents.

2.6 Transport: The Plan accepts that the car is the dominant mode of transport in outer London, and Barnet has long been associated with high level of car ownership. Within the



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lifetime of the Plan there will be little change in this reality. Whilst the Local Plan needs to support active travel and public transport opportunities it also needs to provide for adequate parking standards to meet the requirements of residents - 70% of whom live in residences with motor vehicles.

Section 3: Barnet's Vision and Objectives:

The Society agrees with the aims of the plan as set out in Policy BSS01 Spatial Strategy for Barnet incorporating 46,000 new homes (including affordable accommodation) in the Borough, new office and retail space, a Regional Park, three designated sports hubs, attention to climate change, and with a social, green and physical infrastructure to support these aspirations.

Section 4: Growth and Spatial Strategy:

Of most interest to us here is Policy GSS07 Mill Hill East: This claims that there is a capacity to deliver 1,400 new homes including Mill Hill Station (127), Watchtower House (219) and IBSA House (125). The Policy claims these three sites would produce 745 new homes which is an error as the residential numbers for these sites totals 471. This error has been acknowledged by Council Officers through an email exchange with the Society. The Policy is right to emphasise the Mill Hill Conservation Area and the Green Belt designations.

Policy GSS08 Barnet's District Town Centres: We note that The Broadway in Mill Hill is designated as a District Town Centre (Table 13) but is not included in this policy. Is this by design or omission? The policy does seem to concentrate on Town Centres and Main Town Centres and we are wondering if the policy title is in error.

Clauses 4.20.11 – 13 and Policy GSS09: These clauses outline the use of station car parks for development, for either residential or commercial uses. As a matter of principle, if the authorities wish travellers to use stations (either rail or underground) for journeys rather than use cars, even to the point of reducing traffic on the roads to allow the freer use of buses, then the provision of adequate parking at transport hubs (not less) is a necessity. The Local Plan needs to allow for this.

Clause 4.24.3 subsection Copthall Playing Fields and Sunny Hill Park: The description of the location says it has connections to Arrandene Open Space and Mill Hill Park which it does not. They are nearby but the connections are tenuous. The Society is most concerned that whilst the Local Plan calls for existing nature reserve and woodland areas to be



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enhanced, the Master Plan sections off such areas for the future expansion of Hasmorean School. Such areas are not used for sport but they are for the recreation which fits with the Council's plan for Health and Wellbeing. The level of protection necessary for these areas is not spelled out in the Local Plan.

Clause 4.24.5 The All London Green Grid Strategy: The Society has noticed a considerable number of references to '*enhancement of footpath, cycling and bridleway networks*' and here is as good a place as any to comment on this aspect. We trust that due consideration will be given to safety issues where routes are shared with walkers, children and possibly less able people. This is important, as there is an increasing range of faster electric cycles and scooters that could be used on these improved routes and we would not wish to promote anything that might potentially lead to accidents happening. The Plan claims that such locations need improved access to '*unlock their full potential*' which at the same time might lead to the ruin of their attractiveness.

Section 5: Housing:

Policy HOU01 Affordable Housing: We note that the Borough target is 35% affordable housing from all developments of 10 or more dwellings. This is at odds with the London Plan target of 50% and the Society is concerned that this will lead to endless 'call-ins' by the Mayor, with a subsequent loss of control by the Council over developments in the Borough. We suggest a more robust argument is made in support of the 35% figure or it is increased more in line with the London Plan. The new target is less than the 40% set in the current Local Plan Core Strategy, which in a time of great housing need seems inappropriate.

Policy HOU02 Housing Mix: We are pleased the policy promotes 3 bedroom homes as the highest priority for sale or rent, with 2 or 4 bedrooms as a medium priority. The Society has been increasingly concerned that new developments in NW7 have had a proliferation of 1 and 2 bedroom units that do not reinforce the current property 'grain' of the area.

Section 5.6 and Policy HOU03 Residential Conversions:

It is important for us to say where we really agree with the Local Plan and this section and Policy is one that we wholly support. Too many proposed alterations are inappropriate and blight areas that have some intrinsic architectural, amenity or heritage value. We feel that there should also be a presumption against losing front gardens to hardstanding and reference to surface water drainage issues in areas prone to flooding.



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Chapter 6: Character, Design and Heritage:

Clause 6.16 Tall Buildings and Barnet's Skyline and Policy CDH04 Tall Buildings:

The Society supports the Policy on Tall Buildings and Very Tall Buildings. Whilst the policy is good we are very concerned that schemes like Pentavia can still happen in areas where they are totally inappropriate, and this goes to show that enforcement of the policy matters as much as the policy itself. Clause 6.16.8 and Map 4 are relevant in terms of protected views, and we support the view from the Mill Field receiving some protection, although we feel that views all along The Ridgeway from the Conservation Area are worthy of protection.

Section 6.17 and Policy CD05 Extensions:

The Society are pleased that this section has been included and we shall use the Policy to evaluate applications for planning permission. It is our belief that conversion of houses into flats (or HMOs) not only results in the loss of family accommodation, but impacts neighbours through increased noise, overspill car parking and such. As for Policy HOU03 'Residential Conversions' we feel that there should also be a presumption against losing front gardens to hardstanding and a reference to surface water drainage issues in areas prone to flooding. The Society is concerned about 'work at home' garden buildings with large impervious patios for the same reasons.

Section 6.18 Basements:

There is a spread of applications for basement extensions in the Borough, against which other Boroughs have taken a sterner stand than the Local Plan envisages. Guidance from Councils like the London Borough of Richmond is better than that given by Barnet. If anything, Policy CDH06 'Basements' does not go far enough and we would add to this policy something concerning the requirement to not have an adverse impact on, or threaten, the structural stability of adjoining and/or neighbouring properties.

Section 6.22 and Policy CDH09 Advertisements:

This is another issue where the words are fine but the enforcement is poor. We speak of advertising in the Mill Hill Conservation Area where signs proliferate seemingly with no attempt at control. They certainly detract from the quality of the Conservation Area. It seems from Map 5 Areas of Special Advertisement Control that our Conservation Area falls within the area that should have special controls.



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Chapter 9 Economy:

Whilst reference is made in the Local Plan to the loss of office space to residential use under permitted development rights, the Society feels that not enough is proposed to limit the effect of this trend. In the NW7 area particularly we have seen a significant loss of employment premises to residential use, with no attempt to ensure the replacement of the employment opportunities. The National Institute for Medical Research is a good example and there are others. The overriding aim of a sustainable economic growth is that employment, shopping, recreation, entertainment and so forth are available locally thus avoiding the need for significant transportation and commuting. This strategy is not being embodied in the Local Plan.

Section 10.3 Environmental Considerations

Clause 10.3.8 Construction and Policy ECC02 Environmental Considerations: The Local Plan states that '*building works can be hugely disruptive and cause nuisance in terms of vibration, air quality and noise. In addition traffic management, storage and waste can also be problematic. Therefore all developments should demonstrate compliance with the Considerate Constructors Scheme*'. The Society believes this does not go far enough and that Traffic Plans should be mandatory for all construction sites embodied in the Planning Conditions for an Approval; where possible construction traffic routes should avoid Conservation Areas and residential areas, being directed along major thoroughfares. The Traffic Plans should be enforceable.

Policy ECC05 Green Belt and Metropolitan Land:

The Society wholeheartedly supports this policy especially a) ii. '*Development adjacent to Green Belt should not have a significant detrimental effect on the openness of the Green Belt and respect the character of its surroundings*'.

Section 11.6 Parking:

Table 23 – Residential Car Parking Standards: The fact that this table relates to PTAL levels leaves it open to misinterpretation, unless the Council is going to publish an agreed map of PTAL levels for the Borough as different sources show various levels from place to place. After considerable discussion we feel that the LBB Proposed Parking Standards for 1 to 2 bed units at PTAL level 0 should be up to 1.5 maximum car spaces per unit. This truly reflects the remoteness of PTAL level 0. We would point out that these standards are not being met on some currently approved schemes.



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Chapter 12: Delivering the Local Plan

Section 12.8 Enforcement

Clause 12.8.1: The Society is especially concerned that there are various references to '*enforcement*' throughout the document but we are aware this is a challenging area to actually follow through on. We are surprised that enforcement does not have its own policy in the Local Plan so it is absolutely clear as to what the Council's intentions are, and we would prefer one to be added.

15 Annex 1 – Schedule of Site Proposals

The density of any planning application is fundamental and possibly contentious. Once again we are back to PTAL levels which are in themselves contentious in some locations. We are pleased to see that the plan defines the '*Setting*' under 15.2.2: these being Suburban, Urban and Central. In the NW7 area we believe we only have Suburban and Urban and no Central locations, with very few locations at PTAL 4 to 6, and therefore we should not experience seriously higher densities. From our understanding in areas defined as Suburban or Urban with PTAL's from 0 to 3 the range of 'units per hectare' would be from 35 – 95. This is contentious as developers always push for a higher level and the Council always wish to see as many units built as possible. Who is the arbiter of the standard? Policy CDH01 'Promoting High Quality Design' is relevant to this consideration but the interpretation of 'design quality' somewhat arbitrary.

15.4 List of Sites – Summary Table:

The list of potential sites for development includes some 67 locations, with only seven falling within the NW7 postcode. Our initial comments in relation to these seven sites are given below in site number order. Obviously, we reserve the right to comment in detail on any related planning applications that may arise.

Site 29: Scratchwood Quarry: NW7 2AA – Waste Management

This site has the potential for increased use. This is an important site as it is seen to be alongside the main approach to London on the M1 from the north and is a 'gateway site'. On this basis its appearance should be made as attractive as possible with screen planting along the motorway side.

Site 33: Bunns Lane Car Park (Mill Hill & The Broadway) NW7 2AA – Mixed Use

The site has an indicative capacity for 43 residential units and is described as 50% mixed use hotel and car parking. We think this is a proposal with some merit – but it does depend



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on the detail. The idea of a hotel in this location is reasonable - as is residential use. The car parking issue is of most concern: being linked to the station it will attract commuters and parking will need to be provided for them, alongside guests at the hotel; the current car park is also important for people visiting The Broadway for shopping. How these three parking demands are satisfied will be a challenge and dictate the success or otherwise of the scheme.

Site 46: IBSA House The Ridgeway NW7 1RN – Residential with 20% B1 Uses

The site has an indicative capacity for 125 residential units and B1 workspaces for small and medium sized enterprises. We feel that the Initial Planning Considerations listed are good and the Society could support these. However, the current planning application for the site (19/6551/FUL) does not meeting these requirements and is overdeveloped with 197 residential units and no B1 uses. MHPS hopes it is refused until the right proposal can be generated that will meet the demands of this Local Plan.

Site 47: Mill Hill East Station (Mill Hill East Growth Area) NW7 1BS

The site has an indicative capacity for 127 residential units with 40% mixed uses retaining rail infrastructure and car parking. Our Committee thought this could be a worthwhile addition to the Growth Area subject to the detail design.

Site 48: Mill Hill Library, Hartley Avenue NW7 2HX

This site has an indicative potential for 19 residential units with 50% community uses. The Planning Considerations listed seem sensible and additionally we would wish to see the retention of the current façade. Our Committee has concerns about the future location of the library unit.

Site 49: Watchtower House & Kingdom Hall, The Ridgeway NW7 1RS/1RL

The site has an indicative potential for 219 residential units with 50% retained as undeveloped Green Belt and 10% community uses. We wish to note that the Integrated Impact Assessment (part 2) page 450 says that this development will be for 450 homes; MHPS challenged the Council on this detail and it was confirmed that the 450 figure was in error and that the stated 219 figure in this proposed Local Plan was the correct one. Nevertheless we are concerned about this proposal as it seems to infer a loss of Green Belt. Needless to say we agree with the stated Initial Planning Considerations as the site is in the Green Belt and the Conservation Area. We would add that the field below the Kingdom Hall, and to the west of the public footpath, should be retained untouched. We believe that



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NPPF regulations would call for no increase in existing building footprint on this site in the Green Belt and MHPS would evaluate any proposals accordingly. This Local Plan claims that the Council would protect the Green Belt in accordance with NPPF regulations. In specific terms we do not agree with the proposal for this site.

Site 50: Watford Way & Bunns Lane NW7 2EX

This site has an indicative capacity for 105 units. It is a poor site alongside the Watford Way and overshadowed to the west by the proposed Pentavia development with no access. Currently the site acts as a leafy buffer between the housing and the Watford Way. It is difficult to see how this site, with limited access, alongside a busy 'motorway' would be a suitable location for residential development. The overshadowing by the proposed Pentavia development in relation to the afternoon and setting sun will be considerable. MHPS feel this is not an appropriate site and it works quite well at the moment with trees acting as an environmental sink for the Co2 /No2 production from the roadway. This proposal is very short sighted.

This completes our comments on the draft Local Plan and we hope our observations can be given due consideration and contribute to the development of the plan. Please be in touch with us if anything we have said is unclear.

John Living

**John Living Honorary Architect
On behalf of the Planning Group and Management Committee MHPS**

JL / KT / committee/ PG / 3rd March 2020 rev 5th March 2020